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Braidwood Nuclear Station

Technical Requirements Manual (TRM)

December 2012

Braidwood Station, Units 1 and 2 Facility Operating License Nos. NPF-72 and NPF-77 NRC Docket Nos. STN 50-456, STN 50-457 and 72-73

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1.0 USE AND APPLICATION

1.1 Definitions

-----NOTE------

The defined terms of this section appear in capitalized type and are applicable throughout this Technical Requirements Manual.

<u>Term</u> <u>Definition</u>

ACTIONS

ACTIONS shall be that part of a Requirement that prescribes Required Actions to be taken under designated Conditions within specified Completion Times.

CHANNEL CALIBRATION

A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel so that it responds within the required range and accuracy to known inputs. The CHANNEL CALIBRATION shall encompass the entire channel, including the required sensor, alarm, interlock, display, and trip functions. Calibration of instrument channels with Resistance Temperature Detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping calibrations or total channel steps so that the entire channel is calibrated.

CHANNEL CHECK

A CHANNEL CHECK shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter.

CHANNEL OPERATIONAL TEST (COT)

A COT shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify the OPERABILITY of required alarm, interlock, display, and trip functions. The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints so that the setpoints are within the required range and accuracy.

CORE ALTERATION

CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.

CORE OPERATING LIMITS REPORT (COLR)

The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific parameter limits shall be determined for each reload cycle in accordance with Specification 5.6.5. Unit operation within these limits is addressed in individual Specifications.

DOSE EQUIVALENT I-131

DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcurie per gram) that alone would produce the same dose when inhaled as the combined activities of iodine isotopes I-131, I-132, I-133, I-134, and I-135 actually present. The determination of DOSE EQUIVALENT I-131 shall be performed using the Committed Effective Dose Equivalent (CEDE) dose conversion factors from Table 2.1 of EPA Federal Guidance Report No. 11, 1988, "Limiting Values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion, and Ingestion."

MEMBER(S) OF THE PUBLIC

MEMBER(S) OF THE PUBLIC shall include all persons who are not occupationally associated with the plant. This category does not include employees of the licensee, its contractors or vendors and persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational, or other purposes not associated with the plant.

MODE

A MODE shall correspond to any one inclusive combination of core reactivity condition, power level, average reactor coolant temperature, and reactor vessel head closure bolt tensioning specified in Table T1.1-1 with fuel in the reactor vessel.

OFFSITE DOSE CALCULATION MANUAL (ODCM)

The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Environmental Radiological Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports.

OPERABLE - OPERABILITY

A system, subsystem, train, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s).

PROCESS CONTROL PROGRAM (PCP)

The PCP shall contain the current formulas, sampling, analyses, tests, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

PURGE - PURGING

PURGE or PURGING shall be any controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

QUADRANT POWER TILT RATIO (QPTR)

QPTR shall be the ratio of the maximum upper excore detector calibrated output to the average of the upper excore detector calibrated outputs, or the ratio of the maximum lower excore detector calibrated output to the average of the lower excore detector calibrated outputs, whichever is greater.

RATED THERMAL POWER (RTP)

RTP shall be a total reactor core heat transfer rate to the reactor coolant of 3586.6 MWt.

SHUTDOWN MARGIN (SDM)

SDM shall be the instantaneous amount of reactivity by which the reactor is subcritical or would be subcritical from its present condition assuming:

- a. All Rod Cluster Control Assemblies (RCCAs) are fully inserted except for the single RCCA of highest reactivity worth, which is assumed to be fully withdrawn. With any RCCA not capable of being fully inserted, the reactivity worth of the RCCA must be accounted for in the determination of SDM; and
- b. In MODES 1 and 2, the fuel and moderator temperatures are changed to the hot zero power temperature.

SINGLE-FAILURE PROOF LOAD HANDLING SYSTEM Cranes meeting requirements of ASME NOG-1-2004, NUREG-0554 and NUREG-0612, as applicable.

Special Lifting Devices meeting requirements of NUREG-0612, Section 5.1.6(1)(a).

Lifting devices that are not specially designed that meet the requirements of NUREG-0612, Section 5.1.6(1)(b).

Interfacing lift points such as lifting lugs or cask trunions meeting requirements of NUREG-0612, Section 5.1.6(3).

SITE BOUNDARY

The SITE BOUNDARY shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by the licensee.

THERMAL POWER

THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.

TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT)

A TADOT shall consist of operating the trip actuating device and verifying the OPERABILITY of required alarm, interlock, display, and trip functions. The TADOT shall include adjustment, as necessary, of the trip actuating device so that it actuates at the required setpoint within the required accuracy.

UNRESTRICTED AREA

An UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials, or any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes.

VENTILATION EXHAUST TREATMENT SYSTEM

A VENTILATION EXHAUST TREATMENT SYSTEM shall be any system designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal adsorbers and/or HEPA filters for the purpose of removing iodines or particulates from the gaseous exhaust stream prior to the release to the environment. Such a system is not considered to have any effect on noble gas effluents. Engineered Safety Features Atmospheric Cleanup Systems are not considered to be VENTILATION EXHAUST TREATMENT SYSTEM components.

WASTE GAS HOLDUP SYSTEM

A WASTE GAS HOLDUP SYSTEM shall be any system designed and installed to reduce radioactive gaseous effluents by collecting Reactor Coolant System off-gases from the Reactor Coolant System and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

Table T1.1-1 (page 1 of 1) MODES

MODE	TITLE	REACTIVITY CONDITION (k _{eff})	% RATED THERMAL POWER ^(a)	AVERAGE REACTOR COOLANT TEMPERATURE (°F)
1	Power Operation	≥ 0.99	> 5	NA
2	Startup	≥ 0.99	≤ 5	NA
3	Hot Standby	< 0.99	NA	≥ 350
4	Hot Shutdown ^(b)	< 0.99	NA	$350 > T_{avg} > 200$
5	Cold Shutdown ^(b)	< 0.99	NA	≤ 200
6	Refueling ^(c)	NA	NA	NA

- (a) Excluding decay heat.
- (b) All reactor vessel head closure bolts fully tensioned.
- (c) One or more reactor vessel head closure bolts less than fully tensioned.

1.0 USE AND APPLICATION

1.2 Logical Connectors

PURPOSE

The purpose of this section is to explain the meaning of logical connectors.

Logical connectors are used in the Technical Requirements Manual (TRM) to discriminate between, and yet connect, discrete Conditions, Required Actions, Completion Times, Surveillances, and Frequencies. The only logical connectors that appear in the TRM are $\underline{\text{AND}}$ and $\underline{\text{OR}}$. The physical arrangement of these connectors constitutes logical conventions with specific meanings.

BACKGROUND

Several levels of logic may be used to state Required Actions. These levels are identified by the placement (or nesting) of the logical connectors and by the number assigned to each Required Action. The first level of logic is identified by the first digit of the number assigned to a Required Action and the placement of the logical connector in the first level of nesting (i.e., left justified with the number of the Required Action). The successive levels of logic are identified by additional digits of the Required Action number and by successive indentations of the logical connectors.

When logical connectors are used to state a Condition, Completion Time, Surveillance, or Frequency, only the first level of logic is used, and the logical connector is left justified with the statement of the Condition, Completion Time, Surveillance, or Frequency.

EXAMPLES

The following examples illustrate the use of logical connectors.

1.2 Logical Connectors

EXAMPLES (continued)

EXAMPLE 1.2-1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. TLCO not met.	A.1 Verify AND A.2 Restore	

In this example the logical connector $\underline{\text{AND}}$ is used to indicate that when in Condition A, both Required Actions A.1 and A.2 must be completed.

1.2 Logical Connectors

EXAMPLES (continued)

EXAMPLE 1.2-2

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. TLCO not met.	A.1 Trip OR A.2.1 Verify	
	<u>AND</u>	
	A.2.2.1 Reduce	
	<u>OR</u>	
	A.2.2.2 Perform	
	<u>OR</u>	
	A.3 Align	

This example represents a more complicated use of logical connectors. Required Actions A.1, A.2, and A.3 are alternative choices, only one of which must be performed as indicated by the use of the logical connector \underline{OR} and the left justified placement. Any one of these three Actions may be chosen. If A.2 is chosen, then both A.2.1 and A.2.2 must be performed as indicated by the logical connector \underline{AND} . Required Action A.2.2 is met by performing A.2.2.1 or A.2.2.2. The indented position of the logical connector \underline{OR} indicates that A.2.2.1 and A.2.2.2 are alternative choices, only one of which must be performed.

1.0 USE AND APPLICATION

1.3 Completion Times

PURPOSE

The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.

BACKGROUND

Technical Requirements Manual Limiting Conditions for Operation (TLCOs) specify minimum requirements for ensuring safe operation of the unit. The ACTIONS associated with a TLCO state Conditions that typically describe the ways in which the requirements of the TLCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Time(s).

DESCRIPTION

The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the time of discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the TLCO. Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the TLCO Applicability.

If situations are discovered that require entry into more than one Condition at a time within a single TLCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the time of discovery of the situation that required entry into the Condition.

DESCRIPTION (continued)

Once a Condition has been entered, subsequent trains, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will <u>not</u> result in separate entry into the Condition, unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition.

However, when a <u>subsequent</u> train, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:

- a. Must exist concurrent with the <u>first</u> inoperability;
- b. Must remain inoperable or not within limits after the first inoperability is resolved.

The total Completion Time allowed for completing a Required Action to address the subsequent inoperability shall be limited to the more restrictive of either:

- a. The stated Completion Time, as measured from the initial entry into the Condition, plus an additional 24 hours; or
- b. The stated Completion Time as measured from discovery of the subsequent inoperability.

The above Completion Time extension does not apply to those TLCOs that have exceptions that allow completely separate re-entry into the Condition (for each train, subsystem, component, or variable expressed in the Condition) and separate tracking of Completion Times based on this re-entry. These exceptions are stated in individual TLCOs.

DESCRIPTION (continued)

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . ." Example 1.3-3 illustrates one use of this type of Completion Time. The 10 day Completion Time specified for Conditions A and B in Example 1.3-3 may not be extended.

EXAMPLES

The following examples illustrate the use of Completion Times with different types of Conditions and changing Conditions.

EXAMPLE 1.3-1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME		
B. Required Action and	B.1 Be in MODE 3.	6 hours		
associated Completion	AND			
Time not met.	B.2 Be in MODE 5.	36 hours		

Condition B has two Required Actions. Each Required Action has its own separate Completion Time. Each Completion Time is referenced to the time that Condition B is entered.

EXAMPLES (continued)

The Required Actions of Condition B are to be in MODE 3 within 6 hours <u>AND</u> in MODE 5 within 36 hours. A total of 6 hours is allowed for reaching MODE 3 and a total of 36 hours (not 42 hours) is allowed for reaching MODE 5 from the time that Condition B was entered. If MODE 3 is reached within 3 hours, the time allowed for reaching MODE 5 is the next 33 hours because the total time allowed for reaching MODE 5 is 36 hours.

If Condition B is entered while in MODE 3, the time allowed for reaching MODE 5 is the next 36 hours.

EXAMPLES (continued)

EXAMPLE 1.3-2

ACTIONS

_	7011010				
	CONDITION	REQUIRED ACTION	COMPLETION TIME		
Α.	One pump inoperable.	A.1 Restore pump to OPERABLE status.	7 days		
В.	Action and associated	B.1 Be in MODE 3. AND	6 hours		
	Completion Time not met.	B.2 Be in MODE 5.	36 hours		

When a pump is declared inoperable, Condition A is entered. If the pump is not restored to OPERABLE status within 7 days, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the inoperable pump is restored to OPERABLE status after Condition B is entered, Condition A and B are exited, and therefore, the Required Actions of Condition B may be terminated.

When a second pump is declared inoperable while the first pump is still inoperable, Condition A is not re-entered for the second pump. TLCO 3.0.c is entered, since the ACTIONS do not include a Condition for more than one inoperable pump. The Completion Time clock for Condition A does not stop after TLCO 3.0.c is entered, but continues to be tracked from the time Condition A was initially entered.

While in TLCO 3.0.c, if one of the inoperable pumps is restored to OPERABLE status and the Completion Time for Condition A has not expired, TLCO 3.0.c may be exited and operation continued in accordance with Condition A.

EXAMPLES (continued)

While in TLCO 3.0.c, if one of the inoperable pumps is restored to OPERABLE status and the Completion Time for Condition A has expired, TLCO 3.0.c may be exited and operation continued in accordance with Condition B. The Completion Time for Condition B is tracked from the time the Condition A Completion Time expired.

On restoring one of the pumps to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first pump was declared inoperable. This Completion Time may be extended if the pump restored to OPERABLE status was the first inoperable pump. A 24 hour extension to the stated 7 days is allowed, provided this does not result in the second pump being inoperable for > 7 days.

EXAMPLES (continued)

EXAMPLE 1.3-3

ACTIONS

	CONDITION	REQUIRED ACTION	COMPLETION TIME
Α.	One Function X train inoperable.	A.1 Restore Function X train to OPERABLE status.	7 days AND 10 days from discovery of failure to meet the TLCO
В.	One Function Y train inoperable.	B.1 Restore Function Y train to OPERABLE status.	72 hours AND 10 days from discovery of failure to meet the TLCO
С.	One Function X train inoperable. AND	C.1 Restore Function X train to OPERABLE status.	72 hours
	One Function Y train inoperable.	C.2 Restore Function Y train to OPERABLE status.	72 hours

EXAMPLES (continued)

When one Function X train and one Function Y train are inoperable, Condition A and Condition B are concurrently applicable. The Completion Times for Condition A and Condition B are tracked separately for each train starting from the time each train was declared inoperable and the Condition was entered. A separate Completion Time is established for Condition C and tracked from the time the second train was declared inoperable (i.e., the time the situation described in Condition C was discovered).

If Required Action C.2 is completed within the specified Completion Time, Conditions B and C are exited. If the Completion Time for Required Action A.1 has not expired, operation may continue in accordance with Condition A. The remaining Completion Time in Condition A is measured from the time the affected train was declared inoperable (i.e., initial entry into Condition A).

The Completion Times of Conditions A and B are modified by a logical connector with a separate 10 day Completion Time measured from the time it was discovered the TLCO was not met. In this example, without the separate Completion Time, it would be possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the TLCO. The separate Completion Time modified by the phrase "from discovery of failure to meet the TLCO" is designed to prevent indefinite continued operation while not meeting the TLCO. This Completion Time allows for an exception to the normal "time zero" for beginning the Completion Time "clock". In this instance, the Completion Time "time zero" is specified as commencing at the time the TLCO was initially not met, instead of at the time the associated Condition was entered.

EXAMPLES (continued)

EXAMPLE 1.3-4

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more valves inoperable.	A.1 Restore valve(s) to OPERABLE status.	4 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	6 hours 12 hours

A single Completion Time is used for any number of valves inoperable at the same time. The Completion Time associated with Condition A is based on the initial entry into Condition A and is not tracked on a per valve basis. Declaring subsequent valves inoperable, while Condition A is still in effect, does not trigger the tracking of separate Completion Times.

Once one of the valves has been restored to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first valve was declared inoperable. The Completion Time may be extended if the valve restored to OPERABLE status was the first inoperable valve. The Condition A Completion Time may be extended for up to 4 hours provided this does not result in any subsequent valve being inoperable for > 4 hours.

If the Completion Time of 4 hours (plus the extension) expires while one or more valves are still inoperable, Condition B is entered.

EXAMPLES (continued)

EXAMPLE 1.3-5

ACTIONS

Separate Condition entry is allowed for each inoperable valve.

valve.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more valves inoperable.	A.1 Restore valve to OPERABLE status.	4 hours
B. Required Action and associated Completion Time not	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	6 hours
met.	B.E BE III HODE II.	12 11001 3

The Note above the ACTIONS Table is a method of modifying how the Completion Time is tracked. If this method of modifying how the Completion Time is tracked was applicable only to a specific Condition, the Note would appear in that Condition rather than at the top of the ACTIONS Table.

The Note allows Condition A to be entered separately for each inoperable valve, and Completion Times tracked on a per valve basis. When a valve is declared inoperable, Condition A is entered and its Completion Time starts. If subsequent valves are declared inoperable, Condition A is entered for each valve and separate Completion Times start and are tracked for each valve.

EXAMPLES (continued)

If the Completion Time associated with a valve in Condition A expires, Condition B is entered for that valve. If the Completion Times associated with subsequent valves in Condition A expire, Condition B is entered separately for each valve and separate Completion Times start and are tracked for each valve. If a valve that caused entry into Condition B is restored to OPERABLE status, Condition B is exited for that valve.

Since the Note in this example allows multiple Condition entry and tracking of separate Completion Times, Completion Time extensions do not apply.

EXAMPLE 1.3-6

ACTIONS

7.0.2011	10110110				
CONDITION		REQUIRED ACTION		COMPLETION TIME	
	ne channel noperable.	A.1 <u>OR</u>	Perform TSR 3.x.x.x.	Once per 8 hours	
			Reduce THERMAL POWER to ≤ 50% RTP.	8 hours	
Ac as Cc T-	equired ction and ssociated ompletion ime not	B.1	Be in MODE 3.	6 hours	

EXAMPLES (continued)

Entry into Condition A offers a choice between Required Action A.1 or A.2. Required Action A.1 has a "once per" Completion Time, which qualifies for the 25% extension, per TSR 3.0.b, to each performance after the initial performance. The initial 8 hour interval of Required Action A.1 begins when Condition A is entered and the initial performance of Required Action A.1 must be complete within the first 8 hour interval. If Required Action A.1 is followed, and the Required Action is not met within the Completion Time (plus the extension allowed by TSR 3.0.b), Condition B is entered. If Required Action A.2 is followed and the Completion Time of 8 hours is not met, Condition B is entered.

If after entry into Condition B, Required Action A.1 or A.2 is met, Condition B is exited and operation may then continue in Condition A.

EXAMPLES (continued)

EXAMPLE 1.3-7

ACTIONS

CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One subsystem inoperable.	A.1 Verify affected subsystem isolated.	1 hour
			Once per 8 hours thereafter
		<u>AND</u>	
		A.2 Restore subsystem to OPERABLE status.	72 hours
В.		B.1 Be in MODE 3.	6 hours
	Action and associated	AND	
	Completion Time not met.	B.2 Be in MODE 5.	36 hours

Required Action A.1 has two Completion Times. The 1 hour Completion Time begins at the time the Condition is entered and each "Once per 8 hours thereafter" interval begins upon performance of Required Action A.1.

EXAMPLES (continued)

If after Condition A is entered, Required Action A.1 is not met within either the initial 1 hour or any subsequent 8 hour interval from the previous performance (plus the extension allowed by TSR 3.0.b), Condition B is entered. The Completion Time clock for Condition A does not stop after Condition B is entered, but continues from the time Condition A was initially entered. If Required Action A.1 is met after Condition B is entered, Condition B is exited and operation may continue in accordance with Condition A, provided the Completion Time for Required Action A.2 has not expired.

IMMEDIATE COMPLETION TIME

When "Immediately" is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner.

1.0 USE AND APPLICATION

1.4 Frequency

PURPOSE

The purpose of this section is to define the proper use and application of Frequency requirements.

DESCRIPTION

Each Technical Requirements Manual Surveillance Requirement (TSR) has a specified Frequency in which the Surveillance must be met in order to meet the associated Limiting Condition for Operation (TLCO). An understanding of the correct application of the specified Frequency is necessary for compliance with the TSR.

The "specified Frequency" is referred to throughout this section and Section 3.0, Surveillance Requirement (TSR) Applicability. The "specified Frequency" consists of the requirements of the Frequency column of each TSR as well as certain Notes in the Surveillance column that modify performance requirements.

Situations where a Surveillance could be required (i.e., its Frequency could expire), but where it is not possible or not desired that it be performed until sometime after the associated TLCO is within its Applicability, represent potential TSR 3.0.d conflicts. To avoid these conflicts, the TSR (i.e., the Surveillance or the Frequency) is stated such that it is only "required" when it can be and should be performed. With a TSR satisfied, TSR 3.0.d imposes no restriction.

Sometimes special situations dictate when the requirements of a Surveillance are to be met. They are "otherwise stated" conditions allowed by TSR 3.0.a. They may be stated as clarifying Notes in the Surveillance, as part of the Surveillance, or both. Example 1.4-5 discusses these special situations.

DESCRIPTION (continued)

The use of "met" or "performed" in these instances conveys specific meaning. A surveillance is "met" only when the acceptance criteria are satisfied. Known failure of the requirements of a Surveillance, even without a Surveillance specifically being "performed," constitutes a Surveillance not "met." "Performance" refers only to the requirement to specifically determine the ability to meet the acceptance criteria. TSR 3.0.d restrictions would not apply if both the following conditions are satisfied:

- a. The Surveillance is not required to be performed; and
- b. The Surveillance is not required to be met or, even if required to be met, is not known to be failed.

EXAMPLES

The following examples illustrate the various ways that Frequencies are specified. In these examples, the Applicability of the TLCO (TLCO not shown) is MODES 1, 2, and 3. The examples do not reflect the potential application of TLCO 3.0.d.2.

EXAMPLES (continued)

EXAMPLE 1.4-1

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Perform CHANNEL CHECK.	12 hours

Example 1.4-1 contains the type of TSR most often encountered in the Technical Requirements Manual (TRM). The Frequency specifies an interval (12 hours) during which the associated Surveillance must be performed at least one time. Performance of the Surveillance initiates the subsequent interval. Although the Frequency is stated as 12 hours, an extension of the time interval to 1.25 times the stated Frequency is allowed by TSR 3.0.b for operational flexibility. The measurement of this interval continues at all times, even when the TSR is not required to be met per TSR 3.0.a (such as when the equipment is inoperable, a variable is outside specified limits, or the unit is outside the Applicability of the TLCO). If the interval specified by TSR 3.0.b is exceeded while the unit is in a MODE or other specified condition in the Applicability of the TLCO, and the performance of the Surveillance is not otherwise modified (refer to Example 1.4-3), then TSR 3.0.c becomes applicable.

If the interval as specified by TSR 3.0.b is exceeded while the unit is not in a MODE or other specified condition in the Applicability of the TLCO for which performance of the TSR is required, the Surveillance must be performed within the Frequency requirements of TSR 3.0.b prior to entry into the MODE or other specified condition. Failure to do so would result in a violation of TSR 3.0.d.

EXAMPLES (continued)

EXAMPLE 1.4-2

SURVEILLANCE REQUIREMENTS

SONVETEE/WOL NEGOTIVENEGOT	
SURVEILLANCE	FREQUENCY
Verify flow is within limits.	Once within 12 hours after ≥ 25% RTP
	<u>AND</u>
	24 hours thereafter

Example 1.4-2 has two Frequencies. The first is a one time performance Frequency, and the second is of the type shown in Example 1.4-1. The logical connector "AND" indicates that both Frequency requirements must be met. Each time reactor power is increased from a power level < 25% RTP to \geq 25% RTP, the Surveillance must be performed within 12 hours.

The use of "once" indicates a single performance will satisfy the specified Frequency (assuming no other Frequencies are connected by "AND"). This type of Frequency does not qualify for the extension allowed by TSR 3.0.b.

"Thereafter" indicates future performances must be established per TSR 3.0.b, but only after a specified condition is first met (i.e., the "once" performance in this example). If reactor power decreases to < 25% RTP, the measurement of both intervals stops. New intervals start upon reactor power reaching 25% RTP.

EXAMPLES (continued)

EXAMPLE 1.4-3

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Not required to be performed until 12 hours after ≥ 25% RTP.	
Perform channel adjustment.	7 days

The interval continues, whether or not the unit operation is < 25% RTP between performances.

As the Note modifies the required <u>performance</u> of the Surveillance, it is construed to be part of the "specified Frequency." Should the 7 day interval be exceeded while operation is < 25% RTP, this Note allows 12 hours after power reaches ≥ 25% RTP to perform the Surveillance. The Surveillance is still considered to be performed within the "specified Frequency." Therefore, if the Surveillance were not performed within the 7 day (plus the extension allowed by TSR 3.0.b) interval, but operation was < 25% RTP, it would not constitute a failure of the TSR or failure to meet the TLCO. Also, no violation of TSR 3.0.d occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not exceed 12 hours with power ≥ 25% RTP.

Once the unit reaches 25% RTP, 12 hours would be allowed for completing the Surveillance. If the Surveillance were not performed within this 12 hour interval, there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of TSR 3.0.c would apply.

EXAMPLES (continued)

EXAMPLE 1.4-4

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Only required to be performed in MODE 1.	
Perform complete cycle of the valve.	7 days

The interval continues, whether or not the unit operation is in MODE 1, 2, or 3 (the assumed Applicability of the associated TLCO) between performances.

As the Note modifies the required <u>performance</u> of the Surveillance, the note is construed to be part of the "specified Frequency." Should the 7 day interval be exceeded while operation is not in MODE 1, this Note allows entry into and operation in MODES 2 and 3 to perform the Surveillance. The Surveillance is still considered to be performed within the "specified Frequency" if completed prior to MODE 1. Therefore, if the Surveillance were not performed within the 7 day (plus the extension allowed by TSR 3.0.b) interval, but operation was not in MODE 1, it would not constitute a failure of the TSR or failure to meet the TLCO. Also, no violation of TSR 3.0.d occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not result in entry into MODE 1.

Once the unit reaches MODE 1, the requirement for the Surveillance to be performed within its specified Frequency applies and would require that the Surveillance had been performed. If the Surveillance were not performed prior to MODE 1, there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of TSR 3.0.c would apply.

EXAMPLES (continued)

<u>EXAMPLE 1.4-5</u>

SURVEILLANCE REQUIREMENTS

SONVETEE WAS TREASURED TO	
SURVEILLANCE	FREQUENCY
Only required to be met in MODE 1.	
Verify leakage rates are within limits.	24 hours

Example 1.4-5 specifies that the requirements of this Surveillance do not have to be met until the unit is in MODE 1. The interval measurement for the Frequency of this Surveillance continues at all times, as described in Example 1.4-1. However, the Note constitutes an "otherwise stated" exception to the Applicability of this Surveillance. Therefore, if the Surveillance were not performed within the 24 hour interval (plus the extension allowed by TSR 3.0.b), but the unit was not in MODE 1, there would be no failure of the TSR nor failure to meet the TLCO. Therefore, no violation of TSR 3.0.d occurs when changing MODES, even with the 24 hour Frequency exceeded, provided the MODE change was not made into MODE 1. Prior to entering MODE 1 (assuming again that the 24 hour Frequency were not met), TSR 3.0.d would require satisfying the TSR.

1.0 USE AND APPLICATION

1.5 TLCO and TSR Implementation

The Technical Requirements Manual (TRM) provides those limitations upon plant operations which are part of the licensing basis for the station but do not meet the criteria for continued inclusion in the Technical Specifications.

It also provides information which supplements the Technical Specifications such as specific plant setpoints for Technical Specification equipment. Nothing in the TRM shall supersede any Technical Specification requirement.

TLCOs and TSRs are implemented the same as Technical Specifications (see TRM 3.0). However, TLCOs and TSRs are treated as plant procedures and are not part of the Technical Specifications. Therefore the following exceptions apply:

- a. Violations of the Action or Surveillance requirements in a TLCO are not reportable as conditions prohibited by, or deviations from, the Technical Specifications per 10 CFR 50.72 or 10 CFR 50.73, unless specifically required by the TRM.
- b. Power reduction or plant shutdowns required to comply with the Actions of a TLCO or as a result of the application of TLCO 3.0.c are not reportable per 10 CFR 50.72 or 10 CFR 50.73.
- c. Violations of TLCO or TSR requirements, except as provided for in TLCO 3.0 of this manual, shall be treated the same as plant procedure violations.

1.0 USE AND APPLICATION

1.6 Technical Requirements Manual Revisions

Changes to this manual shall be made under the following provisions:

- a. Changes to the TRM shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to TRM without prior NRC approval provided the change does not require prior NRC approval pursuant to 10 CFR 50.59.
- c. The TRM revision process shall contain provisions to ensure that the TRM is maintained consistent with the UFSAR.
- d. Proposed changes that require NRC approval pursuant to 10 CFR 50.59 shall be reviewed and approved by the NRC prior to implementation. Changes to the TRM implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e) as modified by approved exemptions.

$\begin{array}{c} \text{Table T2.0.a-1 (page 1 of 3)} \\ \text{Reactor Trip System Instrumentation Trip Setpoints} \end{array}$

	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	NOMINAL TRIP SETPOINT
1.	Manual Reactor Trip	1,2,	NA
		$3^{(a)}$, $4^{(a)}$, $5^{(a)}$	
2.	Power Range Neutron Flux		
	a. High	1,2	109% RTP ^(h)
	b. Low	1 ^(b) ,2	25% RTP
3.	Power Range Neutron Flux Rate - High Positive Rate	1,2	5% RTP with time constant ≥ 2 sec
4.	Intermediate Range Neutron Flux	1 ^(b) , 2 ^(c)	25% RTP
ō.	Source Range Neutron Flux	2 ^(d)	1.0 E5 cps
		$3^{(a)}$, $4^{(a)}$, $5^{(a)}$	1.0 E5 cps
6.	Overtemperature Δ T	1,2	See LCO 3.3.1
7.	Overpower Δ T	1,2	See LCO 3.3.1

⁽a) With Rod Control System capable of rod withdrawal or one or more rods not fully inserted.

⁽b) Below the P-10 (Power Range Neutron Flux) interlock.

⁽c) Above the P-6 (Source Range Block Permissive) interlock.

⁽d) Below the P-6 (Source Range Block Permissive) interlock.

⁽h) Trip setpoint may be set more conservative than Nominal Trip Setpoint as necessary in response to plant conditions.

Table T2.0.a-1 (page 2 of 3) Reactor Trip System Instrumentation Trip Setpoints

	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	NOMINAL TRIP SETPOINT
8.	Pressurizer Pressure		
	a. Low	1 ^(e)	1885 psig
	b. High	1,2	2385 psig
9.	Pressurizer Water Level - High	1 (e)	92% of instrument span
10.	Reactor Coolant Flow - Low (per loop)	<u>1</u> (e)	90% of loop minimum measured flow
11.	Reactor Coolant Pump (RCP) Breaker Position (per train)	1(e)	NA
12.	Undervoltage RCPs (per train)	1(e)	5268 V
13.	Underfrequency RCPs (per train)	1(e)	57.0 Hz
14.	Steam Generator (SG) Water Level-Low Low (per SG)		
	a. Unit 1	1,2	18.0% of narrow range instrument span
	b. Unit 2	1,2	36.3% of narrow range instrument span
15.	Turbine Trip		
	a. Emergency Trip Header Pressure (per train)	1 ^(f)	1000 psig
	b. Turbine Throttle Valve Closure (per train)	1 (f)	1% open

⁽e) Above the P-7 (Low Power Reactor Trips Block) interlock.

⁽f) Above the P-8 (Power Range Neutron Flux) interlock.

$\begin{array}{c} \text{Table T2.0.a-1 (page 3 of 3)} \\ \text{Reactor Trip System Instrumentation Trip Setpoints} \end{array}$

		FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	NOMINAL TRIP SETPOINT	
16.	Engi	ety Injection (SI) Input from neered Safety Feature Actuation em (ESFAS)	1,2	NA	
17.	Reac	tor Trip System Interlocks			
	a.	Source Range Block Permissive, P-6	2 ^(d)	1E-10 amp	
	b.	Low Power Reactor Trips Block, P-7			
		(1) P-10 Input	1	NA	
		(2) P-13 Input	1	NA	
	С.	Power Range Neutron Flux, P-8	1	30% RTP	1
	d.	Power Range Neutron Flux, P-10	1,2	10% RTP	1
	e.	Turbine Impulse Pressure, P-13	1	10% turbine power	1
18.	Reac	tor Trip Breakers (RTBs) ^(g)	1,2	NA	
			$3^{(a)}$, $4^{(a)}$, $5^{(a)}$	NA	
19.	Reac	tor Trip Breaker Undervoltage	1,2	NA	
	and	Shunt Trip Mechanisms	$3^{(a)}$, $4^{(a)}$, $5^{(a)}$	NA	
20.	Auto	matic Trip Logic	1,2	NA	
			$3^{(a)}$, $4^{(a)}$, $5^{(a)}$	NA	

⁽a) With Rod Control System capable of rod withdrawal or one or more rods not fully inserted.

⁽d) Below the P-6 (Source Range Block Permissive) interlock.

⁽g) Including any reactor trip bypass breakers that are racked in and closed for bypassing an RTB.

		FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	NOMINAL TRIP SETPOINT	
1.	Sat	fety Injection			
	a.	Manual Initiation	1,2,3,4	NA	
	b.	Automatic Actuation Logic and Actuation Relays	1,2,3,4	NA	
	С.	Containment Pressure-High 1	1,2,3	3.4 psig	
	d.	Pressurizer Pressure-Low	1,2,3 ^(a)	1829 psig	
	е.	Steam Line Pressure-Low	1,2,3 ^(a)	640 psig ^(b)	
2.	Cor	ntainment Spray			
	a.	Manual Initiation	1,2,3,4	NA	
	b.	Automatic Actuation Logic and Actuation Relays	1,2,3,4	NA	
	С.	Containment Pressure High-3	1,2,3	20.0 psig	

⁽a) Above the P-11 (Pressurizer Pressure) interlock.

⁽b) Time constants used in the lead/lag controller are $t_1 \geq 50$ seconds and $t_2 \leq 5$ seconds.

		FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	NOMINAL TRIP SETPOINT	
3.	Con	tainment Isolation			
	a.	Phase A Isolation			
		(1) Manual Initiation	1,2,3,4	NA	
		(2) Automatic Actuation Logic and Actuation Relays	1,2,3,4	NA	
		(3) Safety Injection	Refer to Function 1 (Safet initiation functions and re	y Injection) for all equirements.	
	b.	Phase B Isolation			
		(1) Manual Initiation	1,2,3,4	NA	
		(2) Automatic Actuation Logic and Actuation Relays	1,2,3,4	NA	
		(3) Containment Pressure High-3	1,2,3	20.0 psig	I
4.	Ste	am Line Isolation			
	a.	Manual Initiation	1,2 ^(c) ,3 ^(c)	NA	
	b.	Automatic Actuation Logic and Actuation Relays	1,2 ^(g) ,3 ^(g)	NA	
	С.	Containment Pressure-High 2	1,2 ^(g) ,3 ^(g)	8.2 psig	
	d.	Steam Line Pressure			
		(1) Low	$1,2^{(g)},3^{(a)(f)(g)}$	640 psig ^(b)	
		(2) Negative Rate-High	3(d)(g)	100.0 psi ^(e)	ĺ

- (a) Above the P-11 (Pressurizer Pressure) interlock.
- (b) Time constants used in the lead/lag controller are $t_1 \geq 50$ seconds and $t_2 \leq 5$ seconds.
- (c) Except when all Main Steam Isolation Valves (MSIVs) are closed.
- (d) Below the P-11 (Pressurizer Pressure) interlock with Function 4.d.1 blocked.
- (e) Time constant utilized in the rate/lag controller is \geq 50 seconds.
- (f) Below the P-11 (Pressurizer Pressure) interlock with Function 4.d.2 not enabled.
- (g) Except when all Main Steam Isolation Valves (MSIVs) and MSIV bypass valves are closed.

	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	NOMINAL TRIP SETPOINT
Tu	rbine Trip and Feedwater Isolation		
a.	Automatic Actuation Logic and Actuation Relays	1,2 ^(h) ,3 ^(h)	NA
b.	Steam Generator (SG) Water Level-High High (P-14)		
	1) Unit 1	1,2 ^(h) ,3 ^(h)	88.0% of narrow range instrument span
	2) Unit 2	1,2 ^(h) ,3 ^(h)	80.8% of narrow range instrument span
С.	Safety Injection	Refer to Function 1 (Safe initiation functions and	ety Injection) for all requirements.
Αu	xiliary Feedwater		
a.	Automatic Actuation Logic and Actuation Relays	1,2,3	NA
b.	SG Water Level-Low Low		
	1) Unit 1	1,2,3	18.0% of narrow range instrument span
	2) Unit 2	1,2,3	36.3% of narrow range instrument span
С.	Safety Injection	Refer to Function 1 (Safe initiation functions and	
d.	Loss of Offsite Power (Undervoltage on Bus 141(241))	1,2,3	2870 V
e.	Undervoltage Reactor Coolant Pump (per train)	1,2	5268 V
f.	Auxiliary Feedwater Pump Suction Transfer on Suction Pressure-Low	1,2,3	18.1 psia

⁽h) Except when all Feedwater Isolation Valves are closed or isolated by a closed manual valve.

		FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	NOMINAL TRIP SETPOINT
7.	Swi	tchover to Containment Sump		
	a.	Automatic Actuation Logic and Actuation Relays	1,2,3,4	NA
	b.	Refueling Water Storage Tank (RWST) Level-Low Low	1,2,3,4	46.7% of instrument span
		Coincident with Safety Injection	Refer to Function 1 (Safe initiation functions and	
3.	ESF	AS Interlocks		
	a.	Reactor Trip, P-4	1,2,3	NA
	b.	Pressurizer Pressure, P-11	1,2,3	1930 psig
	С.	T _{avg} - Low Low, P-12	1,2,3	550°F
θ.	Los	s of Power		
	a.	Loss of Voltage	1,2,3,4,5 ^(†) ,6 ^(†)	2870 V with time delay of ≤ 1.8 sec
	b.	Degraded Voltage	$1,2,3,4,5^{(i)},6^{(i)}$	3987 V with a time delay of 310 sec

⁽i) When associated DG is required to be OPERABLE by LCO 3.8.2, "AC Sources-Shutdown."

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	NOMINAL TRIP SETPOINT
Boron Dilution Alert Channels		
Volume Control Tank Level High	3,4,5	70.0%

2.1.a MISCELLANEOUS TEST REQUIREMENTS

-----NOTES -----

- 1. Each of the following Surveillances shall be completed within its specified frequency.
- 2. Failure to meet the surveillance requirement require immediate actions to determine OPERABILITY of the associated equipment. LCOs potentially impacted are identified in the TSR with ().

APPLICABILITY: Defined in the TSR

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
TSR 2.4.a.1	 Only applicable in MODE 1. TSR 3.0.d is not applicable. Perform CHANNEL CALIBRATION on Reactor 	18 months
	Coolant System total flow rate indicators. (LCO 3.4.1)	
TSR 2.5.a.1	Required to be met in MODES 1, 2; and MODE 3 with the RCS pressure > 1000 psig.	
	Perform CHANNEL CALIBRATION on accumulator water level channels.	18 months
	(LCO 3.5.1)	

		SURVEILLANCE	FREQUENCY
TSR	2.5.a.2	Required to be met in MODES 1, 2; and MODE 3 with the RCS pressure > 1000 psig.	
		Perform CHANNEL CALIBRATION on accumulator pressure channels.	18 months
		(LCO 3.5.1)	
TSR	2.5.b.1	Required to be met in MODES 1, 2, 3, and 4.	
		Verify, through a visual inspection of all accessible areas of the containment, loose debris which could be transported to the containment sump during LOCA conditions has been removed.	Prior to entering MODE 4
		(LCO 3.5.2/3.5.3)	

			SURVEILLANCE	FREQUENCY
TSR	2.5.b.2	1.	Required to be met in MODES 1, 2, 3, and 4.	
		2.	Only required to be performed once TSR 2.5.b.1 has been completed.	
		3.	TSR 3.0.d is not applicable.	
		area debi con	ify, through a visual inspection of the as affected within containment, loose ris which could be transported to the tainment sump during LOCA conditions has a removed.	Following each containment entry
			(LCO 3.5.2/3.5.3)	

			SURVEILLANCE	FREQUENCY
TSR 2.	.5.c.1	1.	Only applicable to the following ECC: throttle valves:	 S
			a. High Head SI System - SI8810A,B,C,D	
			b. SI System - SI8822A,B,C,D and SI8816A,B,C,D	
		2.	Required to be met in MODES 1, 2, 3; and MODE 4 when the associated ECCS subsystems are required to be OPERABLE.	
		3.	Only required to be performed for affected valves following valve stroking operation or maintenance on the valve.	
			fy the correct position of each tion stop for the ECCS throttle valve	

	SURVEILLANCE	FREQUENCY
TSR 2.5.c.2	1. A flow balance test that introduces flow to the loops shall not be performed in MODE 1, 2, 3, or 4.	
	 Only required to be performed following alterations to the CV pump and/or piping system that alter the ECCS flow characteristics. 	
	3. Required to be met in MODES 1, 2, 3; and MODE 4 when the associated ECCS subsystems are required to be OPERABLE.	
	Verify through analytical means or a flow balance test that the CV pump performance curve and/or the following CV ECCS cold leg injection flow characteristics are met with a single pump running:	Prior to associated subsystems being declared OPERABLE
	a. The sum of the injection line flow rates, excluding the highest flow rate, is ≥ 330 gpm; and	
	b. The total pump flow rate is \leq 550 gpm, including a simulated seal injection flow of \geq 80 gpm.	
	<u>OR</u>	
		(continued)

	SURVEILLANCE				
(continued)		applicable in MODES 1, 2, 3, 4, and 5.			
	CV E char tech	fy the CV pump performance curve and/or ECCS cold leg injection flow racteristics are acceptable by a unical evaluation that concludes the uation results are:			
	1.	within the acceptance criteria of the accident analyses of record; and			
	2.	acceptable for continued equipment operation.			
		AND			
	flow with subs	onstrate by a flow balance test that the rates specified in a. and b. above are nin limits prior to the associated systems being declared OPERABLE owing the next refueling.			
		(LCO 3.5.2)			

			SURVEILLANCE	FREQUENCY
TSR	2.5.c.3	1.	A flow balance test that introduces flow to the loops shall not be performed in MODE 1, 2, 3, or 4.	
		2.	Only required to be performed following alterations to the SI pump and/or piping system that alter the ECCS flow characteristics.	
		3.	Required to be met in MODES 1, 2, 3; and MODE 4 when the associated ECCS subsystems are required to be OPERABLE.	
		bala curv inje	fy through analytical means or a flow moce test that the SI pump performance the and/or the following SI ECCS cold legection flow characteristics are met with ngle pump running:	Prior to associated subsystems being declared OPERABLE
		a.	The sum of the injection line flow rates, excluding the highest flow rate, is \geq 439 gpm; and	
		b.	The total pump flow rate is \leq 655 gpm.	
		<u>OR</u>		
				(continued)

SURVEILLANCE F	REQUIREMENTS (continued)	
	SURVEILLANCE	FREQUENCY
(continued)	Verify the SI pump performance curve and/or SI ECCS cold leg injection flow characteristics are acceptable by a technical evaluation that concludes the evaluation results are:	
	 within the acceptance criteria of the accident analyses of record; and 	
	2. acceptable for continued equipment operation (e.g., pump NPSH, pump runout, etc.).	
	Flow rates specified in a. and b. above shall be returned to within limits prior to the associated subsystems being declared OPERABLE if in a refueling outage or no later than the end of the next refueling if in MODES 1, 2, 3, 4, or 5.	
	(LCO 3.5.2)	
		(continued)

		SURVEILLANCE	FREQUENCY
TSR	2.5.c.4	NOTES	
		 Only required to be performed following alterations to the RHR pump and/or piping system that alter the ECCS flow characteristics. 	
		2. Required to be met in MODES 1, 2, 3; and MODE 4 when the associated ECCS subsystems are required to be OPERABLE.	
		Verify the RHR pump performance curve and/or RHR ECCS cold leg injection flow characteristics are consistent with the assumptions used in the safety analyses. (LCO 3.5.2/LCO 3.5.3)	Prior to associated ECCS subsystems required to be OPERABLE
TSR	2.6.a.1	Deleted.	

		SURVEILLANCE	FREQUENCY
TSR	2.7.a.1	1. This surveillance shall not be performed in MODE 1, 2, or 3. 2. Required to be met in MODES 1, 2, and 3. Perform an inspection of the B Train Auxiliary Feedwater Pump diesel engine in accordance with manufacturer's recommendation for this class of service. (LCO 3.7.5)	18 months
TSR	2.7.a.2	Required to be met in MODES 1, 2, 3, and 4. Perform a hydrographic survey to verify the Essential Service Cooling Pond (ESCP) slopes exhibit no excess degradation. (LCO 3.7.9)	18 months

3.0 TECHNICAL REQUIREMENTS MANUAL (TRM) LIMITING CONDITION FOR OPERATION (TLCO) APPLICABILITY

- TLCO 3.0.a TLCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in TLCO 3.0.b and TLCO 3.0.f.
- TLCO 3.0.b Upon discovery of a failure to meet a TLCO, the Required Actions of the associated Conditions shall be met, except as provided in TLCO 3.0.e.

If the TLCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required unless otherwise stated.

- TLCO 3.0.c When a TLCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, action shall be initiated within 1 hour to:
 - 1. Implement appropriate compensatory actions as needed,
 - 2. Verify that the plant is not in an unanalyzed condition or that a required safety function is not compromised by the inoperabilities, and
 - 3. Within 12 hours, obtain Station Duty Officer approval of the compensatory actions and plan for exiting TLCO 3.0.c.

Exceptions to this TLCO are stated in the individual TLCOs.

Where corrective measures are completed that permit operation in accordance with the TLCO or ACTIONS, completion of the actions required by TLCO 3.0.c is not required.

TLCO 3.0.c is only applicable in MODES 1, 2, 3, and 4.

3.0 TECHNICAL REQUIREMENTS MANUAL (TRM) LIMITING CONDITION FOR OPERATION (TLCO) APPLICABILITY

TLCO 3.0.d When a TLCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- 1. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time:
- 2. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; or
- 3. When an allowance is stated in the individual value, parameter, or other TLCO

This TLCO shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

TLCO 3.0.e

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to TLCO 3.0.b for the system returned to service under administrative control to perform the required testing to demonstrate OPERABILITY.

3.0 TECHNICAL REQUIREMENTS MANUAL (TRM) LIMITING CONDITION FOR OPERATION (TLCO) APPLICABILITY

TLCO 3.0.f

Exception TLCOs allow specified TRM requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TRM requirements remain unchanged. Compliance with Exception TLCOs is optional. When an Exception TLCO is desired to be met but is not met, the ACTIONS of the Exception TLCO shall be met. When an Exception TLCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall be made in accordance with the other applicable TLCOs.

TLCO 3.0.g

TLCOs, including associated ACTIONs, shall apply to each unit individually, unless otherwise indicated. Whenever the TLCO refers to a system or component that is shared by both units, the ACTIONs will apply to both units simultaneously.

3.0 TECHNICAL REQUIREMENTS MANUAL (TRM) SURVEILLANCE REQUIREMENT (TSR) APPLICABILITY

TSR 3.0.a

TSRs shall be met during the MODES or other specified conditions in the Applicability for individual TLCOs, unless otherwise stated in the TSR. Failure to meet a TSR, whether such failure is experienced during the performance of the TSR or between performances of the TSR, shall be failure to meet the TLCO. Failure to perform a TSR within the specified Frequency shall be failure to meet the TLCO except as provided in TSR 3.0.c. TSRs do not have to be performed on inoperable equipment or variables outside specified limits.

TSR 3.0.b

The specified Frequency for each TSR is met if the TSR is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this TSR are stated in the individual TSRs.

TSR 3.0.c

If it is discovered that a TSR was not performed within its specified Frequency, then compliance with the requirement to declare the TLCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the TSR. A risk evaluation shall be performed for any TSR delayed greater than 24 hours and the risk impact shall be managed.

If the TSR is not performed within the delay period, the TLCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the TSR is performed within the delay period and the TSR is not met, the TLCO must immediately be declared not met, and the applicable Condition(s) must be entered.

3.0 TECHNICAL REQUIREMENTS MANUAL (TRM) SURVEILLANCE REQUIREMENT (TSR) APPLICABILITY

TSR 3.0.d

Entry into a MODE or other specified condition in the Applicability of a TLCO shall only be made when the TLCO's TSRs have been met within their specified Frequency, except as provided by TSR 3.0.c. When a TLCO is not met due to TSRs not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with TLCO 3.0.d.

This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

TSR 3.0.e

TSRs shall apply to each unit individually, unless otherwise indicated.

3.1.a Boration Flow Path - Shutdown

- TLCO 3.1.a One of the following boron injection flow paths via the Chemical & Volume Control (CV) System shall be OPERABLE and capable of being powered from an OPERABLE emergency power source:
 - 1. A flow path via a boric acid transfer pump from the Boric Acid Storage System, which is OPERABLE as specified in TLCO 3.1.e for MODE 5 or as specified in TLCO 3.1.f for MODE 4; or
 - 2. A flow path from the Refueling Water Storage Tank (RWST) which is OPERABLE as specified in TLCO 3.1.e for MODE 5 | or as specified in LCO 3.5.4 for MODE 4.

APPLICABILITY: MODES 4 and 5.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Required flow path inoperable. OR Required flow path not capable of being powered from an OPERABLE emergency power source.	A.1 Not applicable if positive reactivity addition is the direct result of a RCS cooldown required by Technical Specifications. Suspend positive reactivity additions.	Immediately

	SURVEILLANCE	FREQUENCY
TSR 3.1.a.1	Only required to be performed when complying with TLCO 3.1.a.1. Verify Boric Acid Storage System solution temperature is ≥ 65°F.	7 days
TSR 3.1.a.2	Verify each manual, power operated, or automatic valve in the required flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.	31 days

3.1.b Boration Flow Paths - Operating

- TLCO 3.1.b One boron injection flow path via the Chemical & Volume (CV) Control System from the Refueling Water Storage Tank (RWST) shall be OPERABLE, and either:
 - 1. One additional OPERABLE flow path from the RWST, or
 - 2. An OPERABLE flow path via a boric acid transfer pump from the Boric Acid Storage System.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One required flow path inoperable.	A.1 Restore required flow path to OPERABLE status.	72 hours

ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
В.	Required Action and associated Completion	B.1	Be in MODE 3.	6 hours
	associated Completion Time of Condition A not met.	<u>AND</u>		
	not met.	B.2	Borate to the SHUTDOWN MARGIN specified in the COLR at 200°F.	6 hours
		<u>AND</u>		
		B.3.1	Restore required flow path to OPERABLE status.	174 hours
		<u>OR</u>		
		B.3.2	Be in MODE 4.	180 hours

SURVEILLANCE REQUIREMENTS

	FREQUENCY	
TSR 3.1.b.1	Only required to be performed when complying with TLCO 3.1.b.2. Verify Boric Acid Storage System solution temperature is ≥ 65°F.	7 days

SURVEILLANCE REQUIREMENTS (continued)

		SURVEILLANCE	FREQUENCY
TSR	3.1.b.2	Verify each manual, power operated, or automatic valve in the required flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.	31 days
TSR	3.1.b.3	This Surveillance shall not be performed in MODE 1, 2, 3, or 4.	
		Verify each automatic valve in the required flow path actuates to its correct position on an actual or simulated safety injection actuation signal.	18 months
TSR	3.1.b.4	Only required to be performed when complying with TLCO 3.1.b.2.	
		Verify required flow path from the Boric Acid Storage System delivers \geq 30 gpm to the RCS.	18 months

3.1.c Charging Pump - Shutdown

TLCO 3.1.c One centrifugal charging pump in the boron injection flow path required by TLCO 3.1.a shall be OPERABLE and capable of being powered from an OPERABLE emergency power source.

APPLICABILITY: MODES 4 and 5.

ACTIONS

	611003			
	CONDITION REQUIRED ACTION		COMPLETION TIME	
Α.	Required charging pump inoperable. OR Required charging pump not capable of being powered from an OPERABLE emergency power source.	A.1 Not applicable if positive reactivity addition is the direct result of a RCS cooldown required by Technical Specifications. Suspend positive reactivity additions.	Immediately	

	FREQUENCY	
TSR 3.1.c.1	Verify the required centrifugal charging pump's developed head at the test flow point is greater than or equal to the required developed head.	In accordance with the Inservice Testing Program

3.1.d Charging Pumps - Operating

TLCO 3.1.d Two centrifugal charging pumps shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One charging pump inoperable.	A.1	Restore charging pump to OPERABLE status.	7 days
В.	Required Action and associated Completion Time of Condition A not met.	B.1 <u>AND</u> B.2	Be in MODE 3. Borate to the	6 hours
		D.Z	SHUTDOWN MARGIN specified in the COLR at 200°F.	o nours
		<u>AND</u>		
		B.3	Be in MODE 4.	12 hours

	SURVEILLANCE	FREQUENCY
TSR 3.1.d.1	Verify each centrifugal charging pump's developed head at the test flow point is greater than or equal to the required developed head.	In accordance with the Inservice Testing Program

3.1.e Borated Water Source - Shutdown

TLCO 3.1.e One of the following borated water sources shall be OPERABLE:

- 1. A Boric Acid Storage System, or
- 2. The Refueling Water Storage Tank (RWST).

APPLICABILITY: MODE 5.

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	Required borated water source inoperable.	A.1	Suspend positive reactivity additions.	Immediately

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE			
TSR 3.1.e.1	Only required to be performed when complying with TLCO 3.1.e.2 and the outside air temperature < 35°F.			
	Verify RWST solution temperature ≥ 35°F.	24 hours		

SURVEILLANCE REQUIREMENTS (continued)

		SURVEILLANCE	FREQUENCY
TSR	3.1.e.2	Only required to be performed when complying with TLCO 3.1.e.2.	
		Verify RWST boron concentration \geq 2300 ppm and \leq 2500 ppm.	7 days
TSR	3.1.e.3	Only required to be performed when complying with TLCO 3.1.e.2.	
		Verify RWST borated water level is \geq 9.0%.	7 days
TSR	3.1.e.4	Only required to be performed when complying with TLCO 3.1.e.1.	
		Verify Boric Acid Storage System solution temperature is ≥ 65°F.	7 days
TSR	3.1.e.5	Only required to be performed when complying with TLCO 3.1.e.1.	
		Verify Boric Acid Storage System boron concentration is ≥ 7000 ppm.	7 days

SURVEILLANCE REQUIREMENTS (continued)

	FREQUENCY	
TSR 3.1.e.6	Only required to be performed when complying with TLCO 3.1.e.1. Verify Boric Acid Storage System borated water level is ≥ 8.0%.	7 days

3.1.f Borated Water Sources - Operating

TLCO 3.1.f The Boric Acid Storage System shall be OPERABLE when required as a borated water source by TLCO 3.1.b for MODES 1, 2, and 3 or TLCO 3.1.a for MODE 4.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	Required Boric Acid Storage System inoperable in MODE 1, 2, or 3.	A.1	Restore the Boric Acid Storage System to OPERABLE status.	72 hours
associat Time of	Required Action and associated Completion Time of Condition A	B.1 AND	Be in MODE 3.	6 hours
	not met.	B.2	Borate to the SHUTDOWN MARGIN specified in the COLR at 200°F.	6 hours
		<u>AND</u>		
		B.3.1	Restore the required Boric Acid Storage System to OPERABLE status.	174 hours
		<u>OR</u>		
		B.3.2	Be in MODE 4.	180 hours

ACTIONS (continued)

	CONDITION	REQUIRED ACTION		COMPLETION TIME
С.	C. Required Boric Acid Storage System inoperable in MODE 4.		Restore the required Boric Acid Storage System to OPERABLE status.	6 hours
		<u>OR</u>		
		C.2	Be in MODE 5.	36 hours

	FREQUENCY	
TSR 3.1.f.1	Verify Boric Acid Storage System solution temperature is ≥ 65°F.	7 days
TSR 3.1.f.2	Verify Boric Acid Storage System boron concentration is ≥ 7000 ppm.	7 days
TSR 3.1.f.3	Verify Boric Acid Storage System borated water level is ≥ 40%.	7 days

3.1.g Position Indication System - Shutdown

TLCO 3.1.g One Digital Rod Position Indication (DRPI), excluding bank demand position indication, shall be OPERABLE and capable of determining the control rod position within 12 steps for each shutdown or control rod not fully inserted.

APPLICABILITY: MODES 3, 4, and 5 with the Rod Control System capable of rod withdrawal.

ACTIONS

CONDITION		REQUIRED ACTION	COMPLETION TIME	
A. One or more shutdown or control rods with required DRPI inoperable.	A.1	Restore required OPERABLE DRPI.	15 minutes	
B. Required Action and associated Completion Time of Condition A not met.	B.1	Initiate action to fully insert all rods.	Immediately	
	<u>OR</u>			
	B.2	Initiate boration to restore RCS boron concentration to within the limits specified in the COLR.	Immediately	
	<u>OR</u>			
	B.3	Open Reactor Trip Breakers (RTBs) and Reactor Trip Bypass Breakers (RTBBs).	Immediately	

	FREQUENCY	
TSR 3.1.g.1	Verify each DRPI agrees within 12 steps of the group demand position for the full indicated range of rod travel.	18 months

3.1.h Shutdown Margin (SDM) - MODE 1 and MODE 2 with $k_{\rm eff} \geq$ 1.0

TLCO 3.1.h SDM shall be within the limits specified in the COLR.

APPLICABILITY: MODE 1, and

MODE 1, and MODE 2 with $k_{\rm eff} \geq$ 1.0.

ACTIONS

71011	. 0110			
	CONDITION	REQUIRED ACTION		COMPLETION TIME
Α.	SDM not within limit.	A.1	Initiate and continue boration.	1 hour
		<u>AND</u>		
		A.2	Restore required SDM to within limits specified in the COLR.	1 hour

	SURVEILLANCE					
TSR 3.1.h.1	bank spec	fy SDM is within limit with control as at the maximum insertion limit wified in LCO 3.1.6 and considering the owing factors: Reactor Coolant System boron concentration,	Prior to operation above 5% RATED THERMAL POWER after each fuel loading			
	b. Control rod position,					
	С.	Reactor Coolant System average temperature,				
	d.	Fuel burnup based on gross thermal energy generation,				
	e.	Xenon concentration, and				
	f.	Samarium concentration.				

3.1.i Shutdown Margin (SDM) - MODE 5

TLCO 3.1.i SDM shall be within the limits specified in the COLR.

APPLICABILITY: MODE 5.

ACTIONS

ACTIONS			
CONDITION	REQUIRED ACTION		COMPLETION TIME
A. SDM not within limit.	A.1	Declare both Boron Dilution Protection System subsystems inoperable and enter Condition C of LCO 3.3.9, "Boron Dilution Protection System (BDPS)," for "Two Boron Dilution Alert channels inoperable or no reactor coolant pump in operation or one or more RCS loop isolation valve(s) not open."	Immediately
	<u>and</u>		
	A.2	Enter Condition A of LCO 3.1.1, "Shutdown Margin (SDM)," for SDM not within limit.	Immediately

SURVEILLANCE	FREQUENCY
NONE	

3.1.j Shutdown and Control Rods

TLCO 3.1.j All shutdown and control rods not fully inserted shall be OPERABLE.

APPLICABILITY: MODES 3, 4, and 5.

ACTIONS

CONDITION		REQUIRED ACTION		COMPLETION TIME
Α.	One or more rods inoperable.	A.1	Verify SDM is within the limits specified in the COLR.	1 hour AND Once per 12 hours thereafter
В.	Required Action and associated Completion Time of Condition A not met. OR SDM not within the limits specified in the COLR for Required Action A.1.	B.1	Initiate and continue boration to restore the required SDM to within limits specified in the COLR.	15 minutes

SURVEILLANCE	FREQUENCY
NONE	

3.1.k Position Indication System - Shutdown (Special Test Exception)

TLCO 3.1.k The requirements of TLCO 3.1.g may be suspended provided either:

- 1. Only one shutdown or control bank is withdrawn from the fully inserted position at a time, or
- 2. The Reactor Coolant System (RCS) boron concentration is within the limits specified in the COLR for maintaining $k_{\rm eff} \leq 0.987$ with all shutdown and control rods fully withdrawn.

APPLICABILITY: MODES 3, 4, and 5 during performance of rod drop time measurements and during the surveillance of Digital Rod Position Indication (DRPI) for OPERABILITY.

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	Only applicable when invoking TLCO 3.1.k.1.	A.1	Restore required OPERABLE DRPI.	15 minutes
	More than one bank of rods withdrawn. OR			
	Only applicable when invoking TLCO 3.1.k.2.			
	RCS boron concentration not within limit.			

ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
В.	Required Actions and associated Completion Times of Condition A not met.	B.1 <u>OR</u>	Initiate action to fully insert all rods.	Immediately
		B.2	Initiate boration to restore RCS boron concentration to within the limits specified in the COLR.	Immediately
		<u>OR</u>		
		В.3	Open Reactor Trip Breakers (RTBs) and Reactor Trip Bypass Breakers (RTBBs).	Immediately

	SURVEILLANCE	FREQUENCY
TSR 3.1.k.1	Only required to be performed when invoking TLCO 3.1.k.1.	
	Verify each DRPI agrees within 12 steps of the group demand position when the rods are stationary and within 24 steps of the group demand position during rod motion.	Once within 24 hours prior to the start of rod drop time measurements
		AND
		24 hours thereafter
TSR 3.1.k.2	Only required to be performed when invoking TLCO 3.1.k.2.	
	Verify the RCS boron concentration is within the limits specified in the COLR for maintaining $k_{\text{eff}} \leq 0.987$ with all shutdown and control rods fully withdrawn.	Once within 2 hours prior to the start of either rod drop time measurements or the surveillance of DRPI for OPERABILITY AND
		2 hours thereafter

3.3 INSTRUMENTATION

3.3.a Movable Incore Detectors

TLCO 3.3.a The Movable Incore Detection System shall be OPERABLE with:

- 1. \geq 75% of the detector thimbles,
- 2. \geq 2 detector thimbles per core quadrant, and
- 3. Sufficient movable detectors, drive, and readout equipment to map these thimbles.

Only \geq 50% of the detector thimbles are required for:

- 1. Power Distribution Monitoring System (PDMS) calibrations after the initial PDMS calibration following each refueling.
- 2. Monitoring normalized symmetric power distribution, i.e., Quadrant Power Tilt Ratio (QPTR) via an incore flux map, provided there are ≥ 2 detector thimbles per core quadrant and at least 2 of the detector thimbles per core quadrant have a symmetric thimble in at least one other quadrant.

APPLICABILITY: When the Movable Incore Detection System is used for:

- 1. Recalibration of the Excore Neutron Flux Detection System,
- 2. Calibration of the PDMS,
- 3. Monitoring normalized symmetric power distribution, or
- 4. Measurement of $F_{\Delta H}^{N}$, $F_{Q}^{C}(Z)$, and $F_{Q}^{W}(Z)$.

ACTIONS

-----NOTE-----

TLCO 3.0.c is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Movable Incore Detection System inoperable.	A.1 Suspend use of the Movable Incore Detection System data for applicable recalibration, measurement, or monitoring.	Immediately

SOTT LED THE	-40111		
		SURVEILLANCE	FREQUENCY
TSR 3.3.a.1 Normalize each detector output when required for:		24 hours	
	a.	Recalibration of the Excore Neutron Flux Detection System,	
	b.	Calibration of the PDMS,	
	С.	Monitoring normalized symmetric power distribution, or	
	d.	Measurement of $F_{\Delta H}^{N}$, $F_{Q}^{C}(Z)$, and $F_{Q}^{W}(Z)$.	

3.3 INSTRUMENTATION

3.3.b Seismic Monitoring Instrumentation

TLCO 3.3.b The seismic monitoring instrumentation in Table T3.3.b-1 shall be OPERABLE.

APPLICABILITY: At all times.

ACTIONS

-----NOTES -----

1. Separate Condition entry is allowed for each instrument.

2. TLCO 3.0.c is not applicable.

CONDITION	REC	QUIRED ACTION	COMPLETION TIME
A. One or more seismic monitoring instruments inoperable.	in	estore required estrument to PERABLE status.	30 days
B. Required Action and associated Completion Time of Condition A not met.	re Op Co th ma pl th	repare and submit a sport to the Plant serating Review smmittee outlining see cause of the alfunction and the ans for restoring see instrument to PERABLE status.	10 days

ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
С.	Required Actions C.2 and C.3 shall be completed whenever Condition C is	C.1 AND	Restore required instrument to OPERABLE status.	24 hours
	One or more required seismic instruments actuated during a confirmed seismic event.	C.2	Analyze data retrieved from instrument to determine the magnitude of the vibratory ground motion.	14 days
		<u>AND</u>		
		C.3	Prepare and submit a report to the Plant Operating Review Committee describing the magnitude, frequency spectrum, and resultant effect upon facility features important to safety.	14 days

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
TSR 3.3.b.1	Verify OPERABLE status indications of the seismic monitoring instrumentation.	31 days

SURVEILLANCE REQUIREMENTS (continued)

		SURVEILLANCE	FREQUENCY
TSR	3.3.b.2	Verify the triaxial acceleration sensors and the time-history accelerographs properly process the equipment internal test signals.	92 days
TSR	3.3.b.3	Verify the response spectrum analyzer properly executes its diagnostic routine.	92 days
TSR	3.3.b.4	TSR 3.3.b.4 may be performed in lieu of the test required by TSR 3.3.b.2. Verify the triaxial acceleration sensors and the time-history accelerographs properly record the equipment internal test signals.	184 days
TSR	3.3.b.5	Verify the electronic calibration of the time-history accelerographs.	18 months
TSR	3.3.b.6	Install fresh magnetic recording plates in the triaxial peak accelerographs.	18 months

Table T3.3.b-1 (page 1 of 1) Seismic Monitoring Instrumentation

	INSTRUMENTS AND SENSOR LOCATIONS	MEASUREMENT RANGE	REQUIRED INSTRUMENTS
1.	Time - History Accelerographs		
	Auxiliary Electrical Equipment Room, OPAO2J	NA	1
2.	Triaxial Peak Accelerographs		
	a. Containment/Reactor Equipment Accumulators	-2 g to +2 g	1
	b. Containment/Reactor Piping	-2 g to +2 g	1
	c. Auxiliary Building/Category I Piping	-2 g to +2 g	1
3.	Response-Spectrum Analyzer		
	Auxiliary Electrical Equipment Room, OPAO2J	None	1
4.	Triaxial Acceleration Sensors		
	a. Containment/10W - 377 ft	-2 g to +2 g	1
	b. Containment/10W - 502 ft	-2 g to +2 g	1
	c. Containment/10X - 426 ft	-2 g to +2 g	1
	d. Free Field/38 + 01S, 34 + 15E	-2 g to +2 g	1
	e. Auxiliary Building/18N - 426 ft	-2 g to +2 g	1
	f. Auxiliary Building/18L - 335 ft	-2 g to +2 g	1

3.3 INSTRUMENTATION

3.3.c Meteorological Monitoring Instrumentation

TLCO 3.3.c The meteorological monitoring instrumentation channels in Table T3.3.c-1 shall be OPERABLE.

APPLICABILITY: At all times.

ACTIONS

----- NOTES -----

- 1. Separate Condition entry is allowed for each channel.
- 2. TLCO 3.0.c is not applicable.

CONDITION REQUIRED ACTION COMPLETION TIME A.1 Restore channel to 7 days A. One or more OPERABLE status. meteorological monitoring instrument channels inoperable. Prepare and submit a report to the Plant Operating Review B. Required Action and B.1 10 days associated Completion Time of Condition A not met. Committee outlining the cause of the malfunction and the plans for restoring the channel to OPERABLE status.

	SURVEILLANCE	FREQUENCY
TSR 3.3.c.1	Perform CHANNEL CHECK.	24 hours
TSR 3.3.c.2	Perform CHANNEL CALIBRATION.	184 days

Table T3.3.c-1 (page 1 of 1) Meteorological Monitoring Instrumentation

		REQUIRED	SURVEILLANCE
	INSTRUMENT AND LOCATION	CHANNELS	REQUIREMENTS
1.	Wind Speed		
	a. Nominal Elevation 34 ft	1	TSR 3.3.c.1 TSR 3.3.c.2
	b. Nominal Elevation 203 ft	1	TSR 3.3.c.1 TSR 3.3.c.2
2.	Wind Direction		
	a. Nominal Elevation 34 ft	1	TSR 3.3.c.1 TSR 3.3.c.2
	b. Nominal Elevation 203 ft	1	TSR 3.3.c.1 TSR 3.3.c.2
3.	Air Temperature - Δ T (Nominal Elevation 30 ft/199 ft)	1	TSR 3.3.c.1 TSR 3.3.c.2

3.3 INSTRUMENTATION

3.3.d Loose-Part Detection System

TLCO 3.3.d The Loose-Part Detection instrumentation in Table T3.3.d-1 shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

-----NOTES -----

1. Separate Condition entry is allowed for each instrument.

2. TLCO 3.0.c is not applicable.

CONDITION REQUIRED ACTION COMPLETION TIME A.1 30 days A. One or more required Restore required Loose-Part Detection instrument to System instruments OPERABLE status. inoperable. B.1 B. Required Action and 10 days Prepare and submit a report to the Plant Operating Review associated Completion Time of Condition A Committee outlining the cause of the not met. malfunction and the plans for restoring the instrument to

OPERABLE status.

SURVEILLANCE REQUIREMENTS

	FREQUENCY	
TSR 3.3.d.1	Perform CHANNEL CHECK.	24 hours
TSR 3.3.d.2	Verification of setpoint not required.	
	Perform CHANNEL OPERATIONAL TEST.	31 days
TSR 3.3.d.3	Perform CHANNEL CALIBRATION.	18 months

Table T3.3.d-1 (page 1 of 1) Loose-Part Detection Instrumentation

The Loose-Part Detection Instrumentation is considered OPERABLE if one of the two sensor channels for each instrument in Table T3.3.d-1 and the associated amplifier are OPERABLE.

	INSTRUMENT AND LOCATION	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS
1.	Reactor Head aVE-LM001 (270°)	1	TSR 3.3.d.1 TSR 3.3.d.2 TSR 3.3.d.3
	OR		
	bVE-LM002 (0°)		
2.	Reactor Bottom	1	TSR 3.3.d.1 TSR 3.3.d.2
	aVE-LM003 (G-9)		TSR 3.3.d.3
	<u>OR</u>		
	bVE-LM004 (H-13)		
3.	"A" Steam Generator Channel Head	1	TSR 3.3.d.1 TSR 3.3.d.2
	aVE-LM005 (Hot Side)		TSR 3.3.d.3
	<u>OR</u> bVE-LM006 (Cold Side)		
4.	"B" Steam Generator Channel Head	1	TSR 3.3.d.1 TSR 3.3.d.2
	aVE-LM007 (Hot Side) OR		TSR 3.3.d.3
	bVE-LM008 (Cold Side)		
5.	"C" Steam Generator Channel Head	1	TSR 3.3.d.1
э.	aVE-LM009 (Hot Side)	1	TSR 3.3.d.1 TSR 3.3.d.2 TSR 3.3.d.3
	OR		1610 6161416
	bVE-LM010 (Cold Side)		
6.	"D" Steam Generator Channel Head	1	TSR 3.3.d.1
	aVE-LM011 (Hot Side)		TSR 3.3.d.2 TSR 3.3.d.3
	<u>OR</u>		
	bVE-LM012 (Cold Side)		

3.3.e Explosive Gas Monitoring Instrumentation

TLCO 3.3.e The explosive gas monitoring instrumentation channels in Table T3.3.e-1 shall be OPERABLE with their Alarm/Trip

setpoints set to ensure that the limits of the Explosive Gas and Storage Tank Radioactivity Monitoring Program are not

exceeded.

APPLICABILITY: According to Table T3.3.e-1.

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----- NOTES -----

1. Separate Condition entry is allowed for each channel.

2. TLCO 3.0.c is not applicable.

CONDITION REQUIRED ACTION COMPLETION TIME

A. One or more required channels inoperable.

A.1.1 Suspend affected system operation.

OR

(continued)

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	(continued)	A.1.2.1	only applicable during degassing operation.	
			Take and analyze grab samples.	Once per 4 hours
			<u>AND</u>	
		A.1.2.2	Only applicable during non-degassing operations.	
			Take and analyze grab samples.	Once per 24 hours
		<u>AND</u>		
		A.2.1	Restore channel to OPERABLE status.	30 days
		<u>OR</u>		
		A.2.2	Prepare and submit a report to the Plant Operating Review Committee explaining the reason for not correcting the inoperability in a timely manner.	60 days

SURVEILLANCE REQUIREMENTS

	FREQUENCY	
TSR 3.3.e.1	Perform CHANNEL CHECK.	24 hours
TSR 3.3.e.2	Perform CHANNEL OPERATIONAL TEST.	31 days
TSR 3.3.e.3	1. For the Hydrogen Analyzer, the CHANNEL CALIBRATION shall include the use of standard gas samples containing hydrogen and nitrogen.	
	2. For the Oxygen Analyzer and the Waste Gas Compressor Discharge Oxygen Analyzer, the CHANNEL CALIBRATION shall include the use of standard gas samples containing oxygen and nitrogen.	
	Perform CHANNEL CALIBRATION.	92 days

Table T3.3.e-1 (page 1 of 1) Explosive Gas Monitoring Instrumentation

	INSTRUMENT	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS
1.	Hydrogen Analyzer (OAT-GW8000)	(a)	1	TSR 3.3.e.1 TSR 3.3.e.2 TSR 3.3.e.3
2.	Oxygen Analyzer (OAIT-GW8003)	(a)	1	TSR 3.3.e.1 TSR 3.3.e.2 TSR 3.3.e.3
3.	Waste Gas Compressor Discharge Oxygen Analyzer (OAIT-GWOO4)	(b)	1	TSR 3.3.e.1 TSR 3.3.e.2 TSR 3.3.e.3

⁽a) During WASTE GAS HOLDUP SYSTEM operation.

⁽b) During Waste Gas Compressor operation.

3.3.f High Energy Line Break (HELB) Isolation Sensors

TLCO 3.3.f The HELB instrumentation channels shown in Table T3.3.f-1 shall be OPERABLE.

APPLICABILITY: According to Table T3.3.f-1.

ACTIONS

----- NOTES-----

- 1. Separate Condition entry is allowed for each channel.
- 2. TLCO 3.0.c is not applicable.

CONDITION REQUIRED ACTION COMPLETION TIME A.1 7 days A. One or more required Restore the required channel to OPERABLE auxiliary steam isolation status. instrumentation channels inoperable. 0R A.2 Suspend the supply of 7 days auxiliary steam to the Auxiliary Building. 0R A.3 Establish a 7 days continuous watch in the affected area.

ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
В.	B. One or more required steam generator blowdown line isolation instrumentation channels inoperable.	B.1 <u>OR</u>	Restore the required channel to OPERABLE status.	7 days
		B.2	Limit the total steam	7 days
			generator blowdown flow rate to ≤ 60 gpm on the affected unit.	
		<u>OR</u>		
		B.3	Establish a continuous watch in the affected area.	7 days

SURVEILLANCE REQUIREMENTS

-----NOTE-----TSR 3.3.f.1 and TSR 3.3.f.2 apply to each HELB instrument in Table T3.3.f-1.

SURVEILLANCE			FREQUENCY
TSR 3.3	3.f.1 Perform	CHANNEL OPERATIONAL TEST.	18 months
TSR 3.3	3.f.2 Perform	CHANNEL CALIBRATION.	18 months

Table T3.3.f-1 (page 1 of 1) High Energy Line Break Instrumentation

		INSTRUMENT AND LOCATION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS
1.	Aux	iliary Steam Isolation		
	a.	OTS-ASO31A OTS-ASO32A	(a)	1
	b.	OTS-AS031B OTS-AS032B	(a)	1
	С.	OTS-AS031C OTS-AS032C	(b)	1
	d.	OTS-ASO31D OTS-ASO32D	(b)	1
	e.	OTS-ASO31E OTS-ASO32E	(b)	1
	f.	OTS-ASO31F OTS-ASO32F	(b)	1
2.	Ste	am Generator Blowdown Line Isolation		
	a.	TS-SD045A TS-SD045B	1,2,3,4	1
	b.	TS-SD046A TS-SD046B	1,2,3,4	1
	С.	TS-SD045C TS-SD045D	1,2,3,4	1
	d.	TS-SD046C TS-SD046D	1,2,3,4	1

⁽a) When auxiliary steam is supplied from any source to the Auxiliary Building, except when the Recycle Evaporator Auxiliary Steam blank-off flange is installed in line OAS96A-10".

⁽b) When auxiliary steam is supplied from any source to the Auxiliary Building, except when the Radwaste Evaporator Auxiliary Steam blank-off flange is installed in line 0ASO3F-16".

3.3.g Turbine Overspeed Protection

TLCO 3.3.g At least one Turbine Overspeed Protection System, as shown in Table T3.3.g-1, shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

------NOTE-------Separate Condition entry is allowed for each valve.

CONDITION			REQUIRED ACTION	COMPLETION TIME
Α.	One throttle valve or one governor valve per high pressure turbine steam line inoperable.	A.1	Restore the valve to OPERABLE status.	72 hours
В.	One reheat stop valve or one reheat intercept valve per low pressure turbine steam line inoperable.	B.1	Restore the valve to OPERABLE status.	72 hours
С.	Required Action and associated Completion Time of Condition A or B not met.	C.1 OR	Close at least one valve in the affected steam line.	6 hours
		C.2	Isolate the turbine from the steam supply.	6 hours

continued)
(

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Turbine Overspeed Protection System inoperable for reasons other than Condition A or B.	D.1 For additional guidance, reference Tables T3.3.g-1 and T3.3.g-2. Isolate the turbine from the steam supply.	6 hours

SUBVETI LANCE	REQUIREMENTS
SUKVEILLANGE	KEUUTKEMEN 12

-----NOTE------

TSR 3.0.d is not applicable.

nonreturn check valves from the closed 7 days price position.	SURVEILLANCE		
Only required to be performed during turbine operation.	nonreti	Once within 7 days prior to entering MODE 3 from MODE 4.	
movement of each of the 12 extraction steam nonreturn check valve weight arms.	Only re turbine Verify movemen		

SURVEILLANCE REQUIREMENTS (continued)

	FREQUENCY	
TSR 3.3.g.3	Only required to be performed during turbine operation.	
	Verify, by direct observation, closure of each of the following valves from the running position.	31 days
	a. Six turbine reheat stop valves; and	
	b. Six turbine reheat intercept valves.	
TSR 3.3.g.4 Only required		
Verify, by direct observation, closure of each of the following valves from the running position.		184 days
	 Four high pressure turbine throttle valves; and 	
	 Four high pressure turbine governor valves. 	
TSR 3.3.g.5	Perform CHANNEL CALIBRATION.	18 months

SURVEILLANCE REQUIREMENTS (continued)

	FREQUENCY	
TSR 3.3.g.6	Disassemble at least one of each type of the following valves and perform a visual and surface inspection of valve seats, disks, and stems to verify no unacceptable flaws or corrosion:	40 months
	 Four high pressure turbine throttle valves, 	
	 Four high pressure turbine governor valves, 	
	c. Six turbine reheat stop valves,	
	d. Six turbine reheat intercept valves; and	
	e. Twelve extraction steam nonreturn check valves.	

TABLE T3.3.g-1 (page 1 of 1) Turbine Overspeed Protection

TLCO 3.3.g requires at least one Turbine Overspeed Protection System to be OPERABLE. This TLCO is satisfied by the operability of one overspeed trip network along with the turbine throttle, governor, reheat stop, reheat intercept, and nonreturn check valves.

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OVERSPEED TRIP	OVERSPEED TRIP	OVERSPEED TRIP
NETWORK #1	NETWORK #2	NETWORK #3
Speed Probes(1/2SE-TS013_) Turbine Emergency Trip Cabinet 1/2PA38J OST-2 Turbine Overspeed Trip System Panel 1/2TG09J High Pressure Trip Manifold Solenoids 1/2FSV-EH5021A, B, C and D and 1/2FSV-EH5022A, B, C and D	Speed Probes (1/2SE-TS011_) DEH Control Cabinet 1/2PA22J High Pressure Trip Manifold Solenoids 1/2FSV-EH5022A, B, C and D(b)	Speed Probes (1/2SE-TS014_) DEH Control Cabinet 1/2PA22J High Pressure Trip Manifold Solenoids 1/2FSV-EH5021A, B, C and D ^(c)

- (a) The high pressure trip manifold solenoid portion of Overspeed Trip Network #1 is OPERABLE provided any one of the following combinations of solenoids are OPERABLE: 1/2FSV-EH5021A and 1/2FSV-EH5021B; 1/2FSV-EH5021A and 1/2FSV-EH5021D; 1/2FSV-EH5021B and 1/2FSV-EH5021C; 1/2FSV-EH5021C and 1/2FSV-EH5021D; 1/2FSV-EH5022A and 1/2FSV-EH5022B; 1/2FSV-EH5022A and 1/2FSV-EH5022B and 1/2FSV-EH5022C; or 1/2FSV-EH5022C and 1/2FSV-EH5022D
- (b) The high pressure trip manifold solenoid portion of Overspeed Trip Network #2 is OPERABLE provided any one of the following combinations of solenoids are OPERABLE: 1/2FSV-EH5022A and 1/2FSV-EH5022B; 1/2FSV-EH5022A and 1/2FSV-EH5022D; 1/2FSV-EH5022B and 1/2FSV-EH5022C; or 1/2FSV-EH5022C and 1/2FSV-EH5022D.
- (c) The high pressure trip manifold solenoid portion of Overspeed Trip Network #3 is OPERABLE provided any one of the following combinations of solenoids are OPERABLE: 1/2FSV-EH5021A and 1/2FSV-EH5021B; 1/2FSV-EH5021A and 1/2FSV-EH5021D; 1/2FSV-EH5021B and 1/2FSV-EH5021C; or 1/2FSV-EH5021C and 1/2FSV-EH5021D.

Entry into TLCO 3.3.g, CONDITIONS A or B is only required when a problem exists with one of the specified valves prohibiting it from closing. The inability of the valve to close requires it to be declared inoperable.

Entry into TLCO 3.3.g, CONDITION D requires isolation of the turbine from the steam supply within 6 hours for the Turbine Overspeed Protection System being inoperable for reasons other than those identified in CONDITIONS A and B.

Examples could include:

1. NO OVERSPEED TRIP NETWORK

The main turbine has three separate electrical overspeed trip networks. Overspeed Trip Network #1 is comprised of speed probes 1/2SE-TS013_, 1/2PA38J, OST-2, 1/2TG09J and High Pressure Trip Manifold Solenoids 1/2FSV-EH5021A, B, C and D and 1/2FSV-EH5022A, B, C and D. Overspeed Trip Network #2 is comprised of speed probes 1/2SE-TS011_, 1/2PA22J and High Pressure Trip Manifold Solenoids 1/2FSV-EH5022A, B, C and D. Overspeed Trip Network #3 is comprised of speed probes 1/2SE-TS014_, 1/2PA22J and High Pressure Trip Manifold Solenoids 1/2FSV-EH5021A, B, C and D. With no overspeed trip network, the turbine must be isolated from the steam supply.

2. FAILURE ON A NONRETURN CHECK VALVE

Failure of a nonreturn check valve to move freely would require the valve to be declared inoperable and entry in to CONDITION D. Isolation of the steam flow path is accomplished by closing the MOV and/or manual isolation valve. Closing the MOV and/or manual isolation valve prohibits the reflux of extraction steam from the isolated steam line and satisfies Required Action of CONDITION D. Reference Table T3.3.g-2 for determining the correct valve (MOV or manual) to isolate the flow path.

TABLE T3.3.g-2 (page 1 of 1)
Extraction Steam Nonreturn Check Valves and the Associated MOV or Manual Isolation Valve

HEATER	FAILED EXTRACTION STEAM NONRETURN CHECK VALVE	MOTOR-OPERATED ISOLATION VALVE	MANUAL ISOLATION VALVES
_2A	_ES011A	_ES010A	NA
2B	_ES011B	_ES010B	NA
_2C	_ES011C	_ES010C	NA
_3A	_ES015A	_ES013A	NA
_3B	_ES015B	_ES013B	NA
_30	_ES015C	_ES013C	NA
_4A	_ES017A	_ES016A	NA
4B	_ES017B	_ES016B	NA
_4C	_ES017C	_ES016C	NA
_5A	_ES008	_ES007	_ES009A
_5B	_ES008	_ES007	_ES009B
_6A	_ES002	_ES001	_ES003A
_6B	_ES002	_ES001	_ES003B
_7A	_ES005	_ES004	_ES006A
_7B	_ES005	_ES004	_ES006B

3.3.h Power Distribution Monitoring System (PDMS)

TLCO 3.3.h The PDMS shall be OPERABLE with required PDMS instrumentation in Table T3.3.h-1 OPERABLE.

APPLICABILITY: MODE 1 with THERMAL POWER > 25% RTP.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
ANOTE Separate Condition entry is allowed for each Function. One or more Functions with one or more required channels inoperable.	A.1 Restore required channel to OPERABLE status.	4 hours

ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
В.	PDMS inoperable for reasons other than Condition A. OR	B.1 <u>AND</u>	Apply LCO 3.1.4, "Rod Group Alignment Limits," as applicable, with PDMS inoperable.	Immediately
	Required Action and associated Completion Time of Condition A not met.	B.2	Apply LCO 3.2.1, "Heat Flux Hot Channel Factor $(F_0(Z))$," as applicable, with PDMS inoperable.	Immediately
		<u>AND</u>		
		B.3	Apply LCO 3.2.2, "Nuclear Enthalpy Rise Hot Channel Factor $(F_{\Delta H}^{N})$," as applicable, with PDMS inoperable.	Immediately
		<u>AND</u>		
		B.4	Apply LCO 3.2.3, "Axial Flux Difference (AFD)," as applicable, with PDMS inoperable.	Immediately
		<u>AND</u>		
		B.5	Apply LCO 3.2.4, "Quadrant Power Tilt Ratio (QPTR)," as applicable, with PDMS inoperable.	Immediately

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
TSR 3.3.h.1	Perform CHANNEL CHECK for each required instrumentation channel.	7 days
TSR 3.3.h.2	NOTENOTENOTENeutron detectors are excluded from CHANNEL CALIBRATION.	
	Perform CHANNEL CALIBRATION for each required instrumentation channel.	18 months

SURVEILLANCE REQUIREMENTS (continued)

		SURVEILLANCE	FREQUENCY
TSR	3.3.h.3	Perform PDMS calibration.	Prior to declaring PDMS OPERABLE after each refueling
			<u>AND</u>
			Not required to be performed until 31 Effective Full Power Days (EFPD) after the Core Exit Thermocouple (CETC) chess knight move pattern not satisfied
			satisfied AND
			180 EFPD thereafter with the CETC chess knight move pattern satisfied

Table T3.3.h-1 (Page 1 of 1)
Power Distribution Monitoring System Instrumentation

FUNCTION	REQUIRED CHANNELS
1. Power Range Neutron Flux Monitors	3
2. Reactor Coolant System (RCS) Cold Leg Temperature	2
3. Reactor Power	1 ^(a)
4. Control Bank Position (per bank)	1 ^(b)
5. Core Exit Temperature	17 with ≥ 2 per core quadrant

- (a) Either calorimetric power, the average power of the power range neutron \mid flux monitors, or the average power of the ΔT channels.
- (b) Either the Demand Position Indication System or the Digital Rod Position \mid Indication (DRPI) System.

3.3.i Post Accident Monitoring (PAM) Instrumentation

The PAM instrumentation for each Function shown in TLCO 3.3.i Table T3.3.i-1 shall be OPERABLE.

APPLICABILITY: According to Table T3.3.i-1.

ACTIONS

----- NOTES -----

1. Separate Condition entry is allowed for each Function.

2. TLCO 3.0.d.3 is applicable.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more Functions with one or more required channel inoperable.	A.1	Enter the Condition referenced in Table T3.3.i-1 for the channel.	Immediately
В.	As required by Required Action A.1 and referenced in Table T3.3.i-1.	B.1	Restore required channel to OPERABLE status.	30 days
С.	As required by Required Action A.1 and referenced in Table T3.3.i-1.	C.1	Restore one required channel to OPERABLE status.	7 days

ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
D.	Required Action D.2.2 shall be completed whenever Required Action D.2.1 is not	D.1	Initiate alternate method of monitoring the appropriate parameters.	72 hours
	met As required by	AND D.2.1	Restore one required channel to OPERABLE	7 days
	Required Action A.1 and referenced in Table T3.3.i-1.	OR	status.	
		D.2.2	Submit a report to the Plant Operating Review Committee outlining the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.	14 days
Ε.	One or more Functions with two required channels inoperable.	E.1	Restore one required channel to OPERABLE status.	7 days
F.	Required Action and associated Completion Time of Condition B, C, D or E not met.	F.1	Enter TLCO 3.0.c.	Immediately

SURVEILLANCE REQUIREMENTS

	FREQUENCY	
TSR 3.3.i.1	Perform CHANNEL CHECK.	31 days
TSR 3.3.i.2	Perform CHANNEL CALIBRATION.	18 months

Table T3.3.i-1 (page 1 of 1) Post Accident Monitoring Instrumentation

	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS
1.	Auxiliary Feedwater Flow Rate (per SG)	1,2,3	2	В	TSR 3.3.i.1 TSR 3.3.i.2
2.	PORV Position Indicator ^(a) (open/closed) (per valve)	1,2,3	1	С	TSR 3.3.i.1
3.	PORV Block Valve Position Indicator ^(b) (open/closed) (per valve)	1,2,3	1	С	TSR 3.3.i.1
4.	Safety Valve Position Indicator (open/closed) (per valve)	1,2,3	1	С	TSR 3.3.i.1
5.	Containment Floor Drain Sump Water Level (Narrow Range)	1,2,3	2	В	TSR 3.3.i.1 TSR 3.3.i.2
6.	Auxiliary Building Vent Stack (Wide Range Noble Gas) (per stack)	1,2,3	1	D	TSR 3.3.i.1 TSR 3.3.i.2
7.	Reactor Coolant Subcooling Margin Monitor ^(c)	1,2,3	2	В	None

⁽a) Not applicable if the associated block valve is in the closed position.

⁽b) Not applicable if the block valve is verified in the closed position and power is removed.

⁽c) Use monitoring channels (10 highest average core exit temperatures) in conjunction with RCS pressure to determine the subcooling margin.

3.3.j Hydrogen Monitor

TLCO 3.3.j One containment hydrogen monitor channel shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

----- NOTE -----

TLCO 3.0.d.3 is applicable.

CONDITION		REQUIRED ACTION		COMPLETION TIME	
Α.		The monitor must be in standby mode to meet the requirement in NUREG-0737, Item	A.1 <u>OR</u>	Place the hydrogen monitor in the standby mode.	Immediately
	2.	II.F.1.6. Not applicable if hydrogen monitor is in operation.	A.2	Declare the hydrogen monitor inoperable.	Immediately
	mon	uired hydrogen itor not in the ndby mode.			

ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
В.	Required hydrogen monitor channel inoperable.	B.1	Confirm readiness for utilizing alternate method of monitoring.	Immediately
		<u>AND</u>		
		B.2	Restore required hydrogen monitor channel to OPERABLE status.	72 hours
C.	Required Action and associated Completion Time of Condition B not met.	C.1	Submit a report to the Plant Operating Review Committee outlining the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the hydrogen monitor channel to OPERABLE status.	14 days

SURVEILLANCE REQUIREMENTS

	FREQUENCY	
TSR 3.3.j.1	Verify hydrogen monitor is in standby mode.	12 hours
TSR 3.3.j.2	Perform CHANNEL CHECK.	31 days
TSR 3.3.j.3	Perform CHANNEL OPERATIONAL TEST.	92 days
TSR 3.3.j.4	Perform CHANNEL CALIBRATION.	18 months

3.3.o Fuel Handling Building Exhaust Filter Plenum (FHB) Ventilation System Actuation Instrumentation

The FHB Ventilation System actuation instrumentation in Table T3.3.o-1 shall be OPERABLE. TLCO 3.3.0

APPLICABILITY: According to Table T3.3.o-1.

ACTIONS

-----NOTE-----

TLCO 3.0.c is not applicable.

CONDITION REQUIRED ACTION COMPLETION TIME

A. One channel A.1 Restore channel to 7 days OPERABLE status. inoperable.

ACTIONS (continued)

CONDITION		REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time for Condition A not met. OR Two channels inoperable.	associated Completion Time for Condition A not met. OR Two channels mode one FHB Ventilation System train capable of being powered by an OPERABLE emergency power source.		Immediately
	B.1.2	Take actions to provide an appropriate portable continuous monitor with the same alarm setpoint in the fuel pool area.	Immediately
	OR B.2	Suspend crane operations with loads, including new fuel assemblies, over or within the spent fuel storage pool.	Immediately

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
TSR 3.3.o.1	Perform CHANNEL CHECK.	12 hours

SURVEILLANCE REQUIREMENTS (continued)

	FREQUENCY	
TSR 3.3.0.2	Perform CHANNEL OPERATIONAL TEST.	92 days
TSR 3.3.o.3	Perform CHANNEL CALIBRATION.	18 months

FHB Ventilation System Actuation Instrumentation 3.3.0

TABLE T3.3.o-1 (page 1 of 1) FHB Ventilation System Actuation Instrumentation

FUNCTIONAL UNIT	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	ALARM/TRIP SETPOINT	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS
Fuel Building Isolation Radioactivity-High and Criticality (ORE-ARO55/56)	(a)	≤ 5 mR/h	2	TSR 3.3.0.1 TSR 3.3.0.2 TSR 3.3.0.3

⁽a) During crane operations with loads, including new fuel assemblies, over or within the spent fuel storage pool.

3.3.p Radiation Monitoring Instrumentation

TLCO 3.3.p The Radiation Monitoring instrumentation Alarm/Trip Setpoints for each Function in Table T3.3.p-1 shall be OPERABLE.

APPLICABILITY: According to Table T3.3.p-1.

ACTIONS

-----NOTE------

Separate Condition entry is allowed for each Function.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more Functions with one or more required channels Alarm/Trip Setpoint(s) not within limits specified in Table T3.3.p-1.	A.1 Adjust the Setpoint to within limit.	4 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME	
B. Required Action and associated Completion Time of Condition A not met.	B.1 Declare the channel inoperable and enter applicable Condition and Required Actions of LCO 3.3.6, "Containment Ventilation Isolation Instrumentation," LCO 3.3.7, "VC Filtration System Actuation Instrumentation," LCO 3.3.8, "FHB Ventilation System Actuation Instrumentation," TLCO 3.3.0, "FHB Ventilation System Actuation Instrumentation," and TLCO 3.7.i, "FHB Ventilation Systems," for one or more radiation monitors inoperable, as applicable.	Immediately	

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
TSR 3.3.p.1	Perform CHANNEL CHECK.	12 hours
TSR 3.3.p.2	Perform CHANNEL OPERATIONAL TEST.	92 days

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE		FREQUENCY
TSR 3.3.p.3	Perform CHANNEL CALIBRATION.	18 months

	FUNCTIONAL UNIT	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	ALARM/TRIP SETPOINT	REQUIRED CHANNELS	CHANNELS TO TRIP/ALARM	SURVEILLANCE REQUIREMENTS
1.	Fuel Building Isolatic Radioactivity-High and Criticality (ORE-ARO55/56)	on (a) i	≤ 5 mR/hr	2	1	TSR 3.3.p.1 TSR 3.3.p.2 TSR 3.3.p.3
2.	Containment Isolation Containment Radioactivity-High					
	a) U-1 (1RE-AR011/12)	A11	(b)	2	1	TSR 3.3.p.1 TSR 3.3.p.2 TSR 3.3.p.3
	b) U-2 (2RE-AR011/12)	A11	(b)	2	1	TSR 3.3.p.1 TSR 3.3.p.2 TSR 3.3.p.3
3.	Main Control Room Isolation-Outside Air Intake-Gaseous Radioactivity-High					
	a) Train A (ORE-PRO31B/32B)	A11	≤ 2 mR/hr	2	1	TSR 3.3.p.1 TSR 3.3.p.2 TSR 3.3.p.3
	b) Train B (ORE-PRO33B/34B)	All	≤ 2 mR/hr	2	1	TSR 3.3.p.1 TSR 3.3.p.2 TSR 3.3.p.3

⁽a) During crane operations with loads, including new fuel assemblies, over or within the spent fuel storage pool.

⁽b) Trip Setpoint is to be established such that the actual submersion dose rate is ≤ 10 mR/hr in the containment building. For containment purge or vent the Setpoint value may be increased up to twice the maximum concentration activity in the containment determined by the sample analysis performed prior to each release in accordance with the ODCM provided the value is $\leq 10\%$ of the equivalent limits with the Noble gases to ≤ 500 mrem/yr to the whole body and to ≤ 3000 mrem/yr to the skin

3.3.y Engineered Safety Feature Actuation System (ESFAS) Instrumentation

TLCO 3.3.y The ESFAS Instrumentation in Table T3.3.y-1 shall be OPERABLE.

APPLICABILITY: According to Table T3.3.y-1.

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more required channel(s) inoperable.	A.1	Enter the Condition referenced in Table T3.3.y-1 for the channel.	Immediately
В.	One Auxiliary Feedwater - Manual Initiation channel inoperable.	B.1	Restore channel to OPERABLE status.	72 hours
С.	Required Action and associated Completion Time of Condition B not met. OR	C.1	Enter TLCO 3.0.c.	Immediately
	Two Auxiliary Feedwater - Manual Initiation channels inoperable.			

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
TSR 3.3.y.1	Perform TRIP ACTUATING DEVICE OPERATIONAL TEST.	18 months

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	CONDITIONS	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS
Auxiliary Feedwater - Manual Initiation	1,2,3	В, С	2	TSR 3.3.y.1

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.b RCS Chemistry

TLCO 3.4.b RCS Chemistry shall be maintained within the limits of Table T3.4.b-1.

APPLICABILITY: According to Table T3.4.b-1.

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more chemistry parameters in excess of its Steady-State Limit but within its Transient Limit.	A.1	Restore parameter to within its Steady-State Limit.	24 hours
В.	Dissolved Oxygen concentration in excess of its Steady-State Limit for > 24 hours.	B.1 <u>AND</u> B.2	Be in MODE 3. Be in MODE 4 with T _{avg} ≤ 250°F.	6 hours 36 hours
	OR Dissolved Oxygen concentration in excess of its Transient Limit.		Tavg = 200 T •	

ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
С.	Chloride or Fluoride concentration in excess of its Steady-State Limit for > 24 hours.	C.1	Initiate action to reduce pressurizer pressure ≤ 500 psig.	Immediately
	<u>OR</u>	C.2 AND	Be in MODE 3.	6 hours
	Chloride or Fluoride concentration in excess of its Transient Limit.	C.3 AND	Be in MODE 5.	36 hours
		C.4	Perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the RCS and to determine that the RCS remains acceptable for continued operation.	Prior to increasing pressurizer pressure above 500 psig OR Prior to proceeding to MODE 4 from MODE 5

SURVEILLANCE REQUIREMENTS

TSR 3.4.b.1 applies to each RCS Chemistry parameter in Table T3.4.b-1.

	SURVEILLANCE	FREQUENCY
TSR 3.4.b.1		
	 Not required to be performed for Dissolved Oxygen in Mode 1 if Dissolved Hydrogen concentration is ≥ 15 cc/kg and is sampled at the same frequency as Dissolved Oxygen. 	
	Verify RCS chemistry parameters within limits specified in Table T3.4.b-1.	In accordance with EPRI PWR Primary Water Chemistry Guidelines

Table T3.4.b-1 RCS Chemistry Limits

	PARAMETER	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	STEADY STATE LIMIT	TRANSIENT LIMIT
1.	Dissolved Oxygen	MODES 1,2,3, and MODE 4 with T _{avg} > 250°F	≤ 100 ppb	≤ 1000 ppb
2.	Chloride	At All Times	≤ 150 ppb	≤ 1500 ppb
3.	Fluoride	At All Times	≤ 150 ppb	≤ 1500 ppb

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.c Pressurizer Temperature Limits

TLCO 3.4.c The pressurizer temperature shall be limited to:

- 1. $\leq 100^{\circ}$ F heatup in any 1 hour period;
- 2. \leq 200°F cooldown in any 1 hour period; and
- 3. \leq 320°F spray water temperature differential.

APPLICABILITY: At all times.

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	Required Actions A.2 and A.3 shall be completed whenever this Condition is entered.	A.1 <u>AND</u>	Restore pressurizer temperature to within limits.	30 minutes
	Pressurizer temperature not within limits.	A.2	Perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the pressurizer.	72 hours
		<u>AND</u>		
		A.3	Determine that the pressurizer remains acceptable for continued operation.	72 hours

ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
В.	Required Actions and associated Completion Times of Condition A not met.	B.1	Required Action B.1 is only applicable when in MODES 1 and 2.	
			Be in MODE 3.	6 hours
		<u>AND</u>		
		B.2	Reduce pressurizer pressure to < 500 psig.	36 hours

	FREQUENCY	
TSR 3.4.c.1	Only required to be performed during system heatup and cooldown.	
	Verify pressurizer heatup or cooldown rates are within limits.	30 minutes
TSR 3.4.c.2	Only required to be performed during auxiliary spray operation.	
	Verify auxiliary spray water temperature differential is within limit.	12 hours

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.d Pressurizer Power Operated Relief Valves (PORVs)

TLCO 3.4.d One PORV shall be unisolated and capable of responding in automatic to relieve pressurizer pressure.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	Both PORVs unable to automatically perform a pressure relief actuation.	A.1	Restore the automatic pressure relief function to at least one PORV.	72 hours
В.	Required Action and associated Completion Time of Condition A	B.1 AND	Be in MODE 3.	6 hours
	not met.	B.2	Be in MODE 4.	12 hours

	SURVEILLANCE	FREQUENCY
TSR 3.4.d.1	Perform CHANNEL CALIBRATION on the actuation instrumentation.	18 months

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.e Reactor Vessel Head Vents

TLCO 3.4.e

Two reactor vessel head vent paths, each consisting of two valves in series powered from emergency buses, shall be OPERABLE and closed.

The reactor vessel head vent valves may be cycled for the purposes of re-seating to eliminate identified seat leakage, correcting indication problems, or Inservice Inspection in MODES 3 and 4 provided:

- 1. Only one valve in each train is cycled at a time; and
- 2. The same train redundant valve is verified closed and de-energized.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

ACTIONS			
CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One reactor vessel head vent path inoperable.	A.1	Initiate action to maintain the inoperable vent path closed.	Immediately
	<u>AND</u>		
	A.2	Initiate action to remove power from the valve actuators of the valves in the inoperable vent path.	Immediately

ACTIONS (continued)

	CONDITION		REQUIRED ACTION	COMPLETION TIME
В.	TLCO 3.0.d.3 is applicable in MODES 1 and 2 provided Required Actions B.1 and B.2 are complete.	B.1 AND	Initiate action to maintain the inoperable vent paths closed.	Immediately
	Both reactor vessel head vent paths inoperable.	B.2	Initiate action to remove power from the valve actuators of the valves in the inoperable vent paths.	Immediately
		AND B.3	Restore one vent path to OPERABLE status.	30 days
С.	Required Actions and associated Completion Times of Condition B not met.	C.1	Enter TLCO 3.0.c.	Immediately

SURVEILLANCE REQUIREMENTS

	FREQUENCY	
TSR 3.4.e.1	SR 3.4.e.1 Verify all manual isolation valves in each vent path are locked in the open position.	

SURVEILLANCE REQUIREMENTS (continued)

	FREQUENCY	
TSR 3.4.e.2	This Surveillance shall not be performed in MODE 1, 2, 3, or 4 except as allowed by TLCO Note.	
	Perform a complete cycle of each valve in the vent path from the control room.	18 months
TSR 3.4.e.3	This Surveillance shall not be performed in MODE 1, 2, 3, or 4.	
	Verify flow through the reactor vessel head vent paths during venting operation.	18 months

- 3.5 EMERGENCY CORE COOLING SYSTEM (ECCS)
- 3.5.a ECCS Subsystems $T_{avg} \leq 200^{\circ}F$ and Pressurizer Level $\leq 5\%$
- TLCO 3.5.a One of the following means of decay heat removal shall be available:
 - 1. One Safety Injection (SI) pump and flow path, or
 - 2. A flow path to permit gravity feed from the RWST to the Reactor Coolant System (RCS) with the reactor vessel head removed.

APPLICABILITY: MODES 5 and 6 with pressurizer level \leq 5%.

ACTIONS

CONDITION		REQUIRED ACTION		COMPLETION TIME	
Α.	No means of decay heat removal available.	A.1	Initiate action to restore an available means of decay heat removal.	Immediately	
		<u>OR</u>			
		A.2	Initiate action to establish pressurizer level > 5%.	Immediately	

		SURVEILLANCE	FREQUENCY
TSR	3.5.a.1	Only required to be performed when complying with TLCO 3.5.a.1.	
		Verify the required SI pump motor circuit breaker is racked in.	12 hours
TSR	3.5.a.2	Only required to be performed when complying with TLCO 3.5.a.1.	
		Verify an OPERABLE flow path available from the RWST to the RCS.	12 hours
TSR	3.5.a.3	Only required to be performed when complying with TLCO 3.5.a.2.	
		Verify the reactor vessel head is removed.	12 hours
TSR	3.5.a.4	Only required to be performed when complying with TLCO 3.5.a.2.	
		Verify an OPERABLE flow path available to permit gravity feed from the RWST to the RCS.	12 hours

3.7.a Steam Generator Pressure/Temperature Limitations

TLCO 3.7.a Reactor and Secondary coolant pressure shall be \leq 200 psig.

APPLICABILITY: When either Reactor or Secondary coolant temperature in the steam generator is $\leq 70^{\circ}F$.

ACTIONS

Separate Condition entry is allowed for each side (Primary or Secondary) of each steam generator.

CONDITION		REQUIRED ACTION		COMPLETION TIME	
Α.	Required Actions A.2 and A.3 shall be completed whenever this Condition is entered.	A.1 AND	Reduce the steam generator pressure of the applicable side to ≤ 200 psig.	30 minutes	
	Reactor coolant pressure > 200 psig. OR Secondary coolant pressure > 200 psig.	A.2	Perform an engineering evaluation to determine the effect of the overpressurization on the structural integrity of the steam generator.	Prior to increasing temperature to > 200°F	
		<u>AND</u>			
		A.3	Determine that the steam generator remains acceptable for continued operation.	Prior to increasing temperature to > 200°F	

	FREQUENCY	
TSR 3.7.a.1	Only required to be performed when the temperature of either Reactor or Secondary coolant ≤ 70°F. Verify pressure in each side of the steam generator is ≤ 200 psig.	1 hour

3.7.b Snubbers

TLCO 3.7.b All required snubbers shall be OPERABLE.

> ----- NOTE -----Not applicable to snubbers installed on nonsafety related systems unless their failure, or failure of the associated system(s), would adversely affect any safety related system.

APPLICABILITY:

MODES 1, 2, 3, 4, and MODES 5, and 6 for snubbers located on systems required OPERABLE in those MODES.

ACTIONS

-----NOTE------Separate Condition entry is allowed for each snubber.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Req sha onl snu dec dur exal the acc exc	Required Action A.2 shall be completed only when one or more snubber(s) are	A.1	Replace or restore the snubber to OPERABLE status.	72 hours
	declared inoperable during any visual examination or when the functional test acceptance criteria is exceeded. One or more required snubber(s) removed or inoperable.	A.2	Perform an engineering evaluation on the attached component to determine if the component is acceptable for continued operation.	72 hours
В.	Required Actions and associated Completion Times of Condition A not met.	B.1 <u>AND</u>	Declare the attached system inoperable.	Immediately
		B.2	Follow the appropriate Required Actions for that system.	Immediately

SURVEILLANCE REQUIREMENTS	
The provisions of TSR 3.0.b are applicable for all inspection and including 48 months.	intervals up to
SURVEILLANCE	FREQUENCY

	FREQUENCY	
TSR 3.7.b.1	Perform required inservice examinations and testing of snubbers in accordance with the Inservice Inspection Program.	In accordance with the Inservice Inspection Program

Table T3.7.b-1 (page 1 of 1) Snubber Inservice Inspection Program Elements

A. <u>Transient Event Inspection</u>

An inspection shall be performed of all snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems within 6 months following such an event. In addition to satisfying the visual inspection acceptance criteria, freedom of motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.

B. Functional Tests

The quantity of required snubbers within an analytical boundary that can be removed at any given time shall be limited to one, unless the piping has been evaluated and the removal of multiple snubbers has been justified. Configurations that utilize two snubbers at the same location shall be considered as one required snubber.

3.7.c Sealed Source Contamination

TLCO 3.7.c Each sealed source containing radioactive material either in excess of 100 μCi of beta and/or gamma emitting material or 5 μCi of alpha emitting material shall be free of \geq 0.005 μCi of removable contamination.

APPLICABILITY: At all times.

ACTIONS

----- NOTES -----

- 1. Separate Condition entry is allowed for each source.
- 2. TLCO 3.0.c is not applicable.

COMPLETION TIME CONDITION REQUIRED ACTION A. -----NOTE-----A.1 Withdraw the sealed Immediately Required Actions A.2 source from use. and A.3 shall be completed whenever AND Condition A is A.2.1 Prior to use or Decontaminate and entered. transfer to repair the sealed another licensee source. One or more sealed sources with removable 0R contamination not A.2.2 Immediately within limits. Dispose of the sealed source in accordance with Commission Regulations. AND A.3 Submit report to the 12 months Plant Operating Review Committee.

SURVEILLANCE REQUIREMENTS

----- NOTES -----

- 1. Each sealed source shall be tested for leakage and/or contamination by the licensee, or other persons specifically authorized by the Commission or Agreement State.
- 2. The test method shall have a detection sensitivity of at least 0.005 μCi per test sample.
- 3. Startup sources and fission detectors previously subjected to core flux are exempted from the TSRs. Startup sources do not include "secondary startup sources" which do not contain radioactive material.
- 4. Sealed sources which are continuously enclosed within a shielded mechanism (i.e., sealed sources within radiation monitoring or boron measuring devices) are considered to be stored and need not be tested unless they are removed from the shielded mechanism.

	FREQUENCY	
TSR 3.7.c.1	Only required to be performed on sources in use. Perform leakage testing for all sealed sources containing radioactive materials with a half-life > 30 days (excluding Hydrogen 3) and in any form other than gas.	6 months

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY		
TSR 3.7.c.2	 Only required to be performed on stored sources not in use. Only required to be performed if not tested within the previous 6 months. 			
	Perform leakage testing for each sealed source and fission detector.	Prior to use or transfer to another licensee		
TSR 3.7.c.3	R 3.7.c.3 Only required to be performed on stored sources not in use.			
	Perform leakage testing on sealed sources and fission detectors transferred without a certificate indicating the last test date.	Prior to use or transfer to another licensee		
TSR 3.7.c.4	Only required to be performed on sealed startup sources and fission detectors not previously subjected to core flux.			
	Perform leakage testing for each sealed startup source and fission detector.	Once within 31 days prior to being subjected to core flux or installed in the core or following repair or maintenance to sources		

3.7.d Area Temperature Monitoring

TLCO 3.7.d The temperature limit of each area in Table T3.7.d-1 shall not be exceeded for > 8 hours, or by $> 30^{\circ}$ F.

APPLICABILITY: Whenever the equipment in the affected area is required to be OPERABLE.

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Separate Condition entry is allowed for each area.

CONDITION		REQUIRED ACTION	COMPLETION TIME
ANOTE Required Actions A.2 and A.3 shall be completed whenever Condition A is	A.1.1 <u>OR</u>	Restore area temperature to within limit.	4 hours
entered. One or more area temperatures exceeding the temperature limit by > 30°F.	A.1.2 AND	Declare the equipment in the affected area inoperable.	4 hours
Dy > 301.	A.2	Submit a report to the Plant Operating Review Committee outlining the cumulative time and the amount by which the temperature in the affected area exceeded the limit.	30 days
	<u>AND</u>		
			(continued)

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	(continued)	A.3	Perform an analysis to demonstrate the continued OPERABILITY of the affected equipment.	30 days
В.	One or more area temperatures exceeding the temperature limit for > 8 hours.	B.1	Submit a report to the Plant Operating Review Committee outlining the cumulative time and the amount by which the temperature in the affected area exceeded the limit.	30 days
		<u>AND</u>		
		B.2	Perform an analysis to demonstrate the continued OPERABILITY of the affected equipment.	30 days

	SURVEILLANCE	FREQUENCY
TSR 3.7.d.1	Verify each area temperature is within limits in accordance with Table T3.7.d-1.	12 hours

Table T3.7.d-1 (page 1 of 1) Area Temperature Monitoring

	AREA	TEMPERATURE LIMIT (°F)
1.	Miscellaneous Electrical Equipment and Battery Rooms	108
2.	ESF Switchgear Rooms	108
3.	Division 12 (Division 22) Cable Spreading Room	108
4.	Upper Cable Spreading Rooms	90
5.	Diesel Generator Rooms	132
6.	Diesel Oil Storage Rooms	132
7.	Auxiliary Building Vent Exhaust Filter Cubicle	105
8.	Centrifugal Charging Pump Rooms	122
9.	Containment Spray Pump Rooms	130
10.	RHR Pump Rooms	130
11.	Safety Injection Pump Rooms	130
12.	Control Room	90
13.	Lower Cable Spreading Rooms	108

3.7.i Fuel Handling Building (FHB) Ventilation Systems

TLCO 3.7.i Two FHB Ventilation System trains shall be OPERABLE.

> ·----NOTE-----The TLCO requirements do not apply when the main hoist/load block travels over the spent fuel pool without a load due to the design of the load block.

During crane operation with loads, including new fuel assemblies, over or within the spent fuel storage pool. APPLICABILITY:

ACTIONS

-----NOTE-----

TLCO 3.0.c is not applicable.

	CONDITION	REQUIRED ACTION		COMPLETION TIME
Α.	One FHB Ventilation System train inoperable.	A.1	Restore FHB Ventilation System train to OPERABLE status.	7 days
В.	Required Action and associated Completion Time of Condition A not met.	B.1	Place in emergency mode one OPERABLE FHB Ventilation System train capable of being powered by an OPERABLE emergency power source.	Immediately
		<u>OR</u>		
		B.2	Suspend crane operation with loads, including new fuel assemblies, over or within the spent fuel storage pool.	Immediately

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Two FHB Ventilation System trains inoperable.	C.1 Suspend crane operation with loads, including new fuel assemblies, over or within the spent fuel storage pool.	Immediately

	SURVEILLANCE	FREQUENCY
TSR 3.7.i.1	For FHB Ventilation Systems required to be OPERABLE, the following SRs are applicable: SR 3.7.13.1 SR 3.7.13.4 SR 3.7.13.5	In accordance with applicable SRs

3.7.j Spent Fuel Pool Water Level

The spent fuel pool water level shall be ≥ 23 ft over the top of irradiated fuel assemblies seated in the storage TLCO 3.7.j racks.

During movement of loads, including new fuel assemblies, over or within the spent fuel pool. APPLICABILITY:

ACTIONS

-----NOTE-----

TLCO 3.0.c is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Spent fuel pool water level not within limit.	A.1 Suspend movement of loads, including new fuel assemblies, over or within the spent fuel pool.	Immediately

	SURVEILLANCE	FREQUENCY
TSR 3.7.j.1	Verify spent fuel pool water level is ≥ 23 ft above the top of the irradiated fuel assemblies seated in the storage racks.	7 days

3.7.k Spent Fuel Pool Boron Concentration

TLCO 3.7.k The spent fuel pool boron concentration shall be \geq 2000 ppm.

APPLICABILITY: Whenever fuel assemblies are stored in the spent fuel pool.

ACTIONS

-----NOTE-----

TLCO 3.0.c is not applicable.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. Spent fuel pool boron concentration not within limit.	A.1	Suspend movement of loads, including new fuel assemblies, over or within the spent fuel pool.	Immediately
	<u>AND</u>		
	A.2	Initiate action to restore spent fuel pool boron concentration to within limit.	Immediately

	SURVEILLANCE	FREQUENCY
TSR 3.7.k.1	Verify the spent fuel pool boron concentration is within limit.	7 days

3.8 ELECTRICAL POWER SYSTEMS

3.8.a Containment Penetration Conductor Overcurrent Protective Devices

TLCO 3.8.a The containment penetration conductor overcurrent protective devices in Table T3.8.a-1 for Unit 1 (Table T3.8.a-2 for Unit 2) shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTIONS

-----NOTES -----

1. Separate Condition entry is allowed for each device.

2. TLCO 3.0.d.3 is applicable to overcurrent devices in circuits which have the circuit breakers tripped, inoperable circuit breakers racked out or removed.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more containment penetration conductor overcurrent protective devices inoperable.	A.1 Restore the protective device to OPERABLE status. OR	72 hours
		(continued)

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	(continued)	A.2.1	Verify the circuit is de-energized with the associated circuit breaker tripped.	72 hours AND 7 days thereafter
		A.2.2	Determine operability status of the affected system or component.	Immediately following initial performance of Required Action A.2.1
		<u>OR</u>		
		A.3.1	Verify the circuit is de-energized with the associated circuit breaker racked out or removed.	72 hours AND 7 days thereafter
		<u>AND</u>		
		A.3.2	Determine operability status of the affected system or component.	Immediately following initial performance of Required Action A.3.1
В.	Required Actions and associated Completion Times of Condition A	B.1 AND	Be in MODE 3.	6 hours
	not met.	B.2	Be in MODE 5.	36 hours

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
TSR 3.8.a.1	 A representative sample shall consist of ≥ 10% of the circuit breakers selected, on a rotating basis, from 6.9 kV and 4.16 kV circuit breakers. 	
	2. For each circuit breaker found inoperable during these functional tests, an additional representative sample of ≥ 10% of all circuit breakers of the inoperable type shall be functionally tested until no more failures are found or all circuit breakers of the inoperable type have been functionally tested.	
	Perform CHANNEL CALIBRATION on the associated protective relays of the sampled circuit breakers.	18 months

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
TSR 3.8.a.2	 A representative sample shall consist of ≥ 10% of the circuit breakers selected, on a rotating basis, from 6.9 kV and 4.16 kV circuit breakers. 	
	2. For each circuit breaker found inoperable during these functional tests, an additional representative sample of ≥ 10% of all circuit breakers of the inoperable type shall be functionally tested until no more failures are found or all circuit breakers of the inoperable type have been functionally tested.	
	Perform an integrated system functional test on a representative sample of each circuit breaker type, which includes simulated automatic actuation of the system to demonstrate that the overall penetration design remains within operable limits.	18 months

SURVEILLANCE REQUIREMENTS (contir	SURVEILLANGE	EMENTS (continued)
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		SURVEILLANCE	FREQUENCY
TSR 3.8.a.	3	A representative sample shall consist of ≥ 10% of the circuit breakers selected, on a rotating basis, from each type of 480 V circuit breakers.	
	2.	Testing of these circuit breakers shall consist of injecting a current in excess of the breakers nominal setpoint and measuring the response time. The measured response time will be compared to the manufacturers data to ensure that it is \leq a value specified by the manufacturer.	
	3.	Circuit breakers found inoperable during functional tests shall be restored to OPERABLE or replaced with OPERABLE circuit breakers prior to resuming operation.	
	4.	For each circuit breaker found inoperable during these functional tests, an additional representative sample of ≥ 10% of all circuit breakers of the inoperable type shall be functionally tested until no more failures are found or all circuit breakers of the inoperable type have been functionally tested.	
	Fun of	ctionally test a representative sample each 480 V circuit breaker type.	18 months

SURVEILLANCE REQUIREMENTS (continued)

		SURVEILLANCE	FREQUENCY
TSR	3.8.a.4	 NOTES A representative sample shall consist of ≥ 10% of the fuses selected, on a rotating basis, from each type of fuse. 	
		2. Testing of these fuses shall consist of a nondestructive resistance measurement test which demonstrates that the fuse meets the manufacturer's design criteria.	
		3. Fuses found inoperable during functional tests shall be replaced with OPERABLE fuses prior to resuming operation.	
		4. For each fuse found inoperable during these functional tests, an additional representative sample of ≥ 10% of all fuses of the inoperable type shall be functionally tested until no more failures are found or all fuses of the inoperable type have been functionally tested.	
		Functionally test a representative sample of each fuse type.	18 months
TSR	3.8.a.5	Only applicable to 6.9 kV and 4.16 kV circuit breakers.	
		Perform an inspection and preventative maintenance for each breaker in accordance with the manufacturer's recommendation.	60 months

Containment Penetration Conductor Overcurrent Protective Devices 3.8.a

	PROTECTIVE DEVICE NUMBER	AND LOCATION	DEVICE	_
1.	6.9 kV Switchgear			
	1RC01PA - RCP A Bus 157 Cub 1		Primary	
	Bus 157 Normal (UAT) Feed ACB 1571		Backup	[
	Bus 157 Emergency (SAT) Feed ACB 1572		Backup	I
	1RCO1PB - RCP B Bus 156 Cub 2		Primary	
	Bus 156 Normal (UAT) Feed ACB 1561		Backup	
	Bus 156 Emergency (SAT) Feed ACB 1562		Backup	I
	1RCO1PC - RCP C Bus 158 Cub 5		Primary	
	Bus 158 Normal (SAT) Feed ACB 1582		Backup	[
	Bus 158 Emergency (UAT) Feed ACB 1581		Backup	I
	1RCO1PD - RCP D Bus 159 Cub 5		Primary	
	Bus 159 Normal (SAT) Feed ACB 1592		Backup	1
	Bus 159 Emergency (UAT) Feed ACB 1591		Backup	I
2.	480 V Pressurizer Heater Switchgear			
	1RYO3EA - Pressurizer Heater Backup Group A,	Compt. A1A-A6A, B1A	Primary	I
		Compt. A1B-A6B, B1B	Backup	I
	1RYO3EB - Pressurizer Heater Backup Group B,	Compt. B1A-B6A, A1A	Primary	I
		Compt. B1B-B6B, A1B	Backup	1
	1RYO3EC - Pressurizer Heater Backup Group C,	Compt. A1A-A6A	Primary	I
		Compt. A1B-A6B	Backup	1
	1RYO3ED - Pressurizer Heater Backup Group D,	Compt. B1A-B6A	Primary	I
		Compt. B1B-B6B	Backup	

TRM Containment Penetration Conductor Overcurrent Protective Devices 3.8.a

PROTECTIVE DEVICE NUMBER AND LOCATION	DEVICE
3. 480 V A.C. Switchgear Circuit Breakers	
1VPO1CA - RCFC Fan 1A	
1A Low Speed Feed Breaker Switchgear 131X Cub 4C	Primary
1A Hi Speed Feed Breaker Switchgear 131X Cub 5C	Primary
Bus 131X Normal Feed 141 Switchgear Cub 19 ACB 1415X	Backup
1VP01CC - RCFC Fan 1C	
1C Low Speed Feed Breaker Switchgear 131X Cub 2C	Primary
1C Hi Speed Feed Breaker Switchgear 131X Cub 3C	Primary
Bus 131X Normal Feed 141 Switchgear Cub 19 ACB 1415X	Backup
1VP01CB - RCFC Fan 1B	
1B Low Speed Feed Breaker Switchgear 132X Cub 4C	Primary
1B Hi Speed Feed Breaker Switchgear 132X Cub 5C	Primary
Bus 132X Normal Feed 142 Switchgear Cub 14 ACB 1425X	Backup
1VP01CD - RCFC Fan 1D	
1D Low Speed Feed Breaker Switchgear 132X Cub 2C	Primary
1D Hi Speed Feed Breaker Switchgear 132X Cub 3C	Primary
Bus 132X Normal Feed 142 Switchgear Cub 14 ACB 1425X	Backup
1EW39E - Containment Stinger Bus Rectifier	
Containment Stinger Bus 134Y Cub 2C	Primary
Fuses in Bus 134Y Cub 2C	Backup
1AP200EA/ED Containment Outage Pwr Distr Panels - Unit 1	
Circuit Breaker in Bus 233X Cub 2C	Primary
Fuses in Bus 233X Cub 2C	Backup
1AP200EB/EC Containment Outage Pwr Distr Panels - Unit 1	
Circuit Breakers in Bus 234X Cub 5D	Primary
Fuses in Bus 234X Cub 5D	Backup
	(continued)

Containment Penetration Conductor Overcurrent Protective Devices 3.8.a

PROTECTIVE DEVICE NUMBER AND LOCATION	DEVICE
4. 480 V Molded Case Circuit Breakers (MCCB)	MCC 133X4
1RCO1PA-A - Cub B1 Front	Primary
Cub B1 Rear	Backup
1RCO1PA-B - Cub B2 Front	Primary
Cub B2 Rear	Backup
1HC22G - Cub B3 Front	Primary
Cub B3 Rear	Backup
1FHO3G - Cub B4 Front	Primary
Cub B4 Rear	Backup
1VP05CA - Cub C1 Front	Primary
Cub C1 Rear	Backup
1RFO3P - Cub C2 Front	Primary
Cub C2 Rear	Backup
1RCO1PD-A - Cub D1 Front	Primary
Cub D1 Rear	Backup
1RCO1PD-B - Cub D2 Front	Primary
Cub D2 Rear	Backup
1RFO2PB - Cub D4 Front	Primary
Cub D4 Rear	Backup
1RF01P - Cub D5 Front	Primary
Cub D5 Rear	Backup
1REO1PA - Cub D6 Front	Primary
Cub D6 Rear	Backup
1VPO2CA - Cub E1 Front	Primary
Cub E1 Rear	Backup
1VPO4CA - Cub E2 Front	Primary
Cub E2 Rear	Backup
1VPO4CC - Cub F1 Front	Primary
Cub F1 Rear	Backup
1EW11EA,B,C - Cub F3 Front	Primary
Cub F3 Rear	Backup
1ICO2EA - Cub F5 Front	Primary
Cub F5 Rear	Backup
1ICO2EB - Cub G1 Front	Primary
Cub G1 Rear	Backup
1ICO2EC - Cub G2 Front	Primary
Cub G2 Rear	Backup

PROTECTIVE DEVICE NUMBER AND LOCATION	DEVICE	
. 480 V Molded Case Circuit Breakers (MCCB)	MCC 134X5	
1ICO2EF - Cub A1 Front	Primary	
Cub A1 Rear	Backup	
1ICO2EE - Cub A2 Front	Primary	
Cub A2 Rear	Backup	
1ICO2ED - Cub A3 Front	Primary	
Cub A3 Rear	Backup	
1FHO2J - Cub G1 Front	Primary	
Cub G1 Rear	Backup	
1FHO3J - Cub G2 Front	Primary	
Cub G2 Rear	Backup	
1RCO1PB-B - Cub B1 Front	Primary	
Cub B1 Rear	Backup	
1REO1PB - Cub B3 Front	Primary	
Cub B3 Rear	Backup	
1RCO1PC-A - Cub C1 Front	Primary	
Cub C1 Rear	Backup	
1RCO1PC-B - Cub C2 Front	Primary	
Cub C2 Rear	Backup	
1VP05CB - Cub J1 Front	Primary	
Cub J1 Rear	Backup	
1RCO1PB-A - Cub C3 Front	Primary	
Cub C3 Rear	Backup	
1HC65G-A - Cub D3 Front	Primary	
Cub D3 Rear	Backup	
1VPO2CB - Cub F1 Front	Primary	
Cub F1 Rear	Backup	
1RCO1R-A - Cub F2-A	Primary	
Cub F2-B	Backup	
1RFO2PA - Cub G3 Front	Primary	
Cub G3 Rear	Backup	
1EW12EA,B,C - Cub F3-A	Primary	
Cub F3-B	Backup	
1VPO4CB - Cub F4 Front	Primary	
Cub F4 Rear	Backup	
1VPO4CD - Cub F5 Front	Primary	
Cub F5 Rear	Backup	

TRM Containment Penetration Conductor Overcurrent Protective Devices 3.8.a

	PROTECTIVE DEVICE NUMBER AND LOCATION	DEVICE
6. 480	V Molded Case Circuit Breakers (MCCB)	MCC 132X2A
1818	808C - Cub A2 MCC 132X2 Cub B2	Primary Backup
1518	808B - Cub A3 MCC 132X2 Cub B2	Primary Backup
7. 480	V Molded Case Circuit Breakers (MCCB)	MCC 132X2
1RH8	702B - Cub B1 Front Cub B1 Rear	Primary Backup
1RH8	701B - Cub B3 Front Cub B3 Rear	Primary Backup
1CV8	112 - Cub B4 Front Cub B4 Rear	Primary Backup
10G0	79 - Cub C1 Front Cub C1 Rear	Primary Backup
1W00	56A - Cub C2 Front Cub C2 Rear	Primary Backup
10G0	80- Cub C3 Front Cub C3 Rear	Primary Backup
1RY8	000B - Cub C4 Front Cub C4 Rear	Primary Backup
1RC8	003C - Cub D5 Front Cub D5 Rear	Primary Backup
1RC8	003B - Cub D4 Front Cub D4 Rear	Primary Backup
1RC8	002A - Cub G1 Front Cub G1 Rear	Primary Backup
1RC8	002B - Cub G2 Front Cub G2 Rear	Primary Backup
1RC8	002C - Cub G3 Front Cub G3 Rear	Primary Backup
1RC8	002D - Cub G4 Front Cub G4 Rear	Primary Backup

Containment Penetration Conductor Overcurrent Protective Devices 3.8.a

PROTECTIVE DEVICE NUMBER AND LOCATION		DEVICE	
8. 480 V Mo	lded Case Circuit Breakers (MCCB)	MCC 131X2A	
1SI8808D	- Cub A2 MCC 131X2 Cub B2	Primary Backup	
1SI8808A	- Cub A3 MCC 131X2 Cub B2	Primary Backup	
9. 480 V Mo	1ded Case Circuit Breakers (MCCB)	MCC 131X2	
1RC8001A	- Cub G1 Front Cub G1 Rear	Primary Backup	
1RC8001B	- Cub G2 Front Cub G2 Rear	Primary Backup	
1RC8001C	- Cub G3 Front Cub G3 Rear	Primary Backup	
1RC8001D	- Cub G4 Front Cub G4 Rear	Primary Backup	
1RH8701A	- Cub B1 Front Cub B1 Rear	Primary Backup	
1RH8702A	- Cub B4 Front Cub B4 Rear	Primary Backup	
1LL42J -	Cub C1 Front Cub C1 Rear	Primary Backup	
1VQ001A	- Cub C3 Front Cub C3 Rear	Primary Backup	
1VQ002A	- Cub F1 Front Cub F1 Rear	Primary Backup	
1RC8003D	- Cub C4 Front Cub C4 Rear	Primary Backup	
1RC8003A	- Cub C5 Front Cub C5 Rear	Primary Backup	
10G057A	- Cub D1 Front Cub D1 Rear	Primary Backup	
1CC9416	- Cub D3 Front Cub D3 Rear	Primary Backup	
1CC9438	- Cub D4 Front Cub D4 Rear	Primary Backup	
10G081 -	Cub E2 Front Cub E2 Rear	Primary Backup	

TRM Containment Penetration Conductor Overcurrent Protective Devices 3.8.a

Table T3.8.a-1 (page 7 of 7) Containment Penetration Conductor Overcurrent Protective Devices (Unit 1)

PROTECTIVE DEVICE NUMBER AND LOCATION		PROTECTIVE DEVICE NUMBER AND LOCATION	DEVICE	
10.	480 V Molde	ed Case Circuit Breakers (MCCB)	MCC 133X6	
	1HC01G -	Cub B2 Cub B1	Primary Backup	
	1LL04E -	Cub C2 Cub C1	Primary Backup	
	1VP03CA -	Cub A3 Front Cub A3 Rear	Primary Backup	
	1VP03CD -	Cub C4 Front Cub C4 Rear	Primary Backup	
11.	480 V Molde	ed Case Circuit Breakers (MCCB)	MCC 134X7	
	1LL05E -	Cub B2 Cub B1	Primary Backup	
	1VPO3CB -	Cub A3 Front Cub A3 Rear	Primary Backup	
	1VPO3CC -	Cub B4 Front Cub B4 Rear	Primary Backup	
12.	480 V Molde	ed Case Circuit Breakers (MCCB)	MCC 131X2B	
	1W0056B -	Cub A4 Front Cub A4 Rear	Primary Backup	
	1RY8000A -	Cub A5 Front Cub A5 Rear	Primary Backup	
13.	260 VAC RCE) Power (53 rods, 5 panels)		
	Stationary Stationary	Gripper Coils fuse (all panels) Gripper Coils fuse (all panels)	Primary Backup	
		fuse (all panels) fuse (all panels)	Primary Backup	
		ipper Coils fuse (all panels) ipper Coils fuse (all panels)	Primary Backup	

Containment Penetration Conductor Overcurrent Protective Devices 3.8.a

Table T3.8.a-2 (page 1 of 7)
Containment Penetration Conductor Overcurrent Protective Devices (Unit 2)

	PROTECTIVE DEVICE NUMBER	AND LOCATION	DEVICE	
1.	6.9 kV Switchgear			_
	2RCO1PA - RCP A Bus 257 Cub 7		Primary	
	Bus 257 Normal (UAT) Feed ACB 2571		Backup	I
	Bus 257 Emergency (SAT) Feed ACB 2572		Backup	1
	2RC01PB - RCP B Bus 256 Cub 5		Primary	
	Bus 256 Normal (UAT) Feed ACB 2561		Backup	
	Bus 256 Emergency (SAT) Feed ACB 2562		Backup	
	2RC01PC - RCP C Bus 258 Cub 3		Primary	
	Bus 258 Normal (SAT) Feed ACB 2582		Backup	I
	Bus 258 Emergency (UAT) Feed ACB 2581		Backup	
	2RCO1PD - RCP D Bus 259 Cub 3		Primary	
	Bus 259 Normal (SAT) Feed ACB 2592		Backup	1
	Bus 259 Emergency (UAT) Feed ACB 2591		Backup	
2.	480 V Pressurizer Heater Switchgear			ĺ
	2RYO3EA - Pressurizer Heater Backup Group A,	Compt. B1A-B6A, A1A	Primary	
		Compt. B1B-B6B, A1B	Backup	
	2RYO3EB - Pressurizer Heater Backup Group B,	Compt. A1A-A6A, B1A	Primary	
		Compt. A1B-A6B, B1B	Backup	
	2RYO3EC - Pressurizer Heater Backup Group C,	Compt. B1A-B6A	Primary	
		Compt. B1B-B6B	Backup	
	2RYO3ED - Pressurizer Heater Backup Group D,	Compt. A1A-A6A	Primary	
		Compt. A1B-A6B	Backup	1

Table T3.8.a-2 (page 2 of 7)
Containment Penetration Conductor Overcurrent Protective Devices (Unit 2)

PROTECTIVE DEVICE NUMBER AND LOCATION	DEVICE
. 480 V A.C. Switchgear Circuit Breakers	
2VP01CA - RCFC Fan 2A	
2A Low Speed Feed Breaker Switchgear 231X Cub 4C	Primary
2A Hi Speed Feed Breaker Switchgear 231X Cub 5C	Primary
Bus 231X Normal Feed 241 Switchgear Cub 4 ACB 2415X	Backup
2VP01CC - RCFC Fan 2C	
2C Low Speed Feed Breaker Switchgear 231X Cub 2C	Primary
2C Hi Speed Feed Breaker Switchgear 231X Cub 3C	Primary
Bus 231X Normal Feed 241 Switchgear Cub 4 ACB 2415X	Backup
2VP01CB - RCFC Fan 2B	
2B Low Speed Feed Breaker Switchgear 232X Cub 4C	Primary
2B Hi Speed Feed Breaker Switchgear 232X Cub 5C	Primary
Bus 232X Normal Feed 242 Switchgear Cub 8 ACB 2425X	Backup
2VP01CD - RCFC Fan 2D	
2D Low Speed Feed Breaker Switchgear 232X Cub 2C	Primary
2D Hi Speed Feed Breaker Switchgear 232X Cub 3C	Primary
Bus 232X Normal Feed 242 Switchgear Cub 8 ACB 2425X	Backup
2EW39E - Containment Stinger Bus Rectifier	
Containment Stinger Bus 234Y Cub 2C	Primary
Fuses in Bus 234Y Cub 2C	Backup
2AP200EA/ED Containment Outage Pwr Distr Panels - Unit 2	
Circuit Breaker in Bus 133X Cub 2C	Primary
Fuses in Bus 133X Cub 2C	Backup
2AP200EB/EC Containment Outage Pwr Distr Panels - Unit 2	
Circuit Breaker in Bus 134X Cub 5D	Primary
Fuses in Bus 134X Cub 5D	Backup

Containment Penetration Conductor Overcurrent Protective Devices 3.8.a

Table T3.8.a-2 (page 3 of 7)
Containment Penetration Conductor Overcurrent Protective Devices (Unit 2)

PROTECTIVE DEVICE NUMBER AND LOCATION	DEVICE
480 V Molded Case Circuit Breakers (MCCB)	MCC 233X4
2RCO1PA-A - Cub B1 Front	Primary
Cub B1 Rear	Backup
2RCO1PA-B - Cub B2 Front	Primary
Cub B2 Rear	Backup
2HC22G - Cub B3 Front	Primary
Cub B3 Rear	Backup
2FHO3G - Cub B4 Front	Primary
Cub B4 Rear	Backup
2VPO5CA - Cub C1 Front	Primary
Cub C1 Rear	Backup
2RF03P - Cub C2 Front	Primary
Cub C2 Rear	Backup
2RCO1PD-A - Cub D1 Front	Primary
Cub D1 Rear	Backup
2RCO1PD-B - Cub D2 Front	Primary
Cub D2 Rear	Backup
2RF02PB - Cub D4 Front	Primary
Cub D4 Rear	Backup
2RF01P - Cub D5 Front	Primary
Cub D5 Rear	Backup
2REO1PA - Cub D6 Front	Primary
Cub D6 Rear	Backup
2VPO2CA - Cub E1 Front	Primary
Cub E1 Rear	Backup
2VPO4CA - Cub E2 Front	Primary
Cub E2 Rear	Backup
2VPO4CC - Cub F1 Front	Primary
Cub F1 Rear	Backup
2EW11EA,B,C - Cub F3 Front	Primary
Cub F3 Rear	Backup
2ICO2EA - Cub F5 Front	Primary
Cub F5 Rear	Backup
2ICO2EB - Cub G1 Front	Primary
Cub G1 Rear	Backup
2ICO2EC - Cub G2 Front	Primary
Cub G2 Rear	Backup

Containment Penetration Conductor Overcurrent Protective Devices 3.8.a

Table T3.8.a-2 (page 4 of 7)
Containment Penetration Conductor Overcurrent Protective Devices (Unit 2)

PROTECTIVE DEVICE NUMBER AND LOCATION	DEVICE
480 V Molded Case Circuit Breakers (MCCB)	MCC 234X5
2ICO2EF - Cub Al Front	Primary
Cub Al Rear	Backup
2ICO2EE - Cub A2 Front	Primary
Cub A2 Rear	Backup
2ICO2ED - Cub A3 Front	Primary
Cub A3 Rear	Backup
2FH02J - Cub G1 Front	Primary
Cub G1 Rear	Backup
2FHO3J - Cub G2 Front	Primary
Cub G2 Rear	Backup
2RCO1PB-B - Cub B1 Front	Primary
Cub B1 Rear	Backup
2RE01PB - Cub B3 Front	Primary
Cub B3 Rear	Backup
2RCO1PC-A - Cub C1 Front	Primary
Cub C1 Rear	Backup
2RCO1PC-B - Cub C2 Front	Primary
Cub C2 Rear	Backup
2VPO5CB - Cub J1 Front	Primary
Cub J1 Rear	Backup
2RCO1PB-A - Cub C3 Front	Primary
Cub C3 Rear	Backup
2HC65G-A - Cub D3 Front	Primary
Cub D3 Rear	Backup
2VPO2CB - Cub F1 Front	Primary
Cub F1 Rear	Backup
2RC01R-A - Cub F2-A	Primary
Cub F2-B	Backup
2RF02PA - Cub G3 Front	Primary
Cub G3 Rear	Backup
2EW12EA,B,C - Cub F3-A	Primary
Cub F3-B	Backup
2VPO4CB - Cub F4 Front	Primary
Cub F4 Rear	Backup
2VPO4CD - Cub F5 Front	Primary
Cub F5 Rear	Backup

TRM Containment Penetration Conductor Overcurrent Protective Devices 3.8.a

Table T3.8.a-2 (page 5 of 7)
Containment Penetration Conductor Overcurrent Protective Devices (Unit 2)

PROTECTIVE DEVICE NUMBER AND LOCATION	DEVICE
5. 480 V Molded Case Circuit Breakers (MCCB)	MCC 232X2A
2SI8808C - Cub A2	Primary
MCC 232X2 Cub B2	Backup
2SI8808B - Cub A3	Primary
MCC 232X2 Cub B2	Backup
7. 480 V Molded Case Circuit Breakers (MCCB)	MCC 232X2
2RH8702B - Cub B1 Front	Primary
Cub B1 Rear	Backup
2RH8701B - Cub B3 Front	Primary
Cub B3 Rear	Backup
2CV8112 - Cub B4 Front	Primary
Cub B4 Rear	Backup
20G079 - Cub C1 Front	Primary
Cub C1 Rear	Backup
2WO056A - Cub C2 Front	Primary
Cub C2 Rear	Backup
20G080 - Cub C3 Front	Primary
Cub C3 Rear	Backup
2RY8000B - Cub C4 Front	Primary
Cub C4 Rear	Backup
2RC8003C - Cub D5 Front	Primary
Cub D5 Rear	Backup
2RC8003B - Cub D4 Front	Primary
Cub D4 Rear	Backup
2RC8002A - Cub G1 Front	Primary
Cub G1 Rear	Backup
2RC8002B - Cub G2 Front	Primary
Cub G2 Rear	Backup
2RC8002C - Cub G3 Front	Primary
Cub G3 Rear	Backup
2RC8002D - Cub G4 Front	Primary
Cub G4 Rear	Backup

Containment Penetration Conductor Overcurrent Protective Devices 3.8.a

Table T3.8.a-2 (page 6 of 7)
Containment Penetration Conductor Overcurrent Protective Devices (Unit 2)

	PROTECTIVE DEVICE NUMBER AND LOCATION	DEVICE
8. 480 V Molded Case	e Circuit Breakers (MCCB)	MCC 231X2A
2SI8808D - Cub MCC	A2 231X2 Cub B2	Primary Backup
2SI8808A - Cub MCC	A3 231X2 Cub B2	Primary Backup
9. 480 V Molded Case	e Circuit Breakers (MCCB)	MCC 231X2
	G1 Front G1 Rear	Primary Backup
	G2 Front G2 Rear	Primary Backup
	G3 Front G3 Rear	Primary Backup
	G4 Front G4 Rear	Primary Backup
	B1 Front B1 Rear	Primary Backup
	B4 Front B4 Rear	Primary Backup
	C1 Front C1 Rear	Primary Backup
2VQ001A - Cub	C3 Front C3 Rear	Primary Backup
	F1 Front F1 Rear	Primary Backup
	C4 Front C4 Rear	Primary Backup
	C5 Front C5 Rear	Primary Backup
	D1 Front D1 Rear	Primary Backup
	D3 Front D3 Rear	Primary Backup
	D4 Front D4 Rear	Primary Backup
	E2 Front E2 Rear	Primary Backup

TRM Containment Penetration Conductor Overcurrent Protective Devices 3.8.a

Table T3.8.a-2 (page 7 of 7) Containment Penetration Conductor Overcurrent Protective Devices (Unit 2)

		PROTECTIVE DEVICE NUMBER AND LOCATION	DEVICE
10.	480 V Molde	ed Case Circuit Breakers (MCCB)	MCC 233X6
	2HC01G -	Cub B2 Cub B1	Primary Backup
	2LL04E -	Cub C2 Cub C1	Primary Backup
	2VP03CA -	Cub A3 Front Cub A3 Rear	Primary Backup
	2VP03CD -	Cub C4 Front Cub C4 Rear	Primary Backup
11.	480 V Molde	ed Case Circuit Breakers (MCCB)	MCC 234X7
	2LL05E -	Cub B2 Cub B1	Primary Backup
	2VP03CB -	Cub A3 Front Cub A3 Rear	Primary Backup
	2VP03CC -	Cub B4 Front Cub B4 Rear	Primary Backup
12.	480 V Molde	ed Case Circuit Breakers (MCCB)	MCC 231X2B
	2W0056B -	Cub A4 Front Cub A4 Rear	Primary Backup
	2RY8000A -	Cub A5 Front Cub A5 Rear	Primary Backup
13.	260 VAC RCE	Power (53 rods, 5 panels)	
	Stationary Stationary	Gripper Coils fuse (all panels) Gripper Coils fuse (all panels)	Primary Backup
		fuse (all panels) fuse (all panels)	Primary Backup
	Movable Gri	ipper Coils fuse (all panels) ipper Coils fuse (all panels)	Primary Backup

3.8 ELECTRICAL POWER SYSTEMS

3.8.b Motor Operated Valves Thermal Overload Protection Devices

TLCO 3.8.b The thermal overload protection devices integral with the motor starter of each valve listed in Table T3.8.b-1 for Unit 1 (Table T3.8.b-2 for Unit 2) shall be OPERABLE.

APPLICABILITY: Whenever the motor operated valve is required to be OPERABLE.

ACTIONS

Separate Condition entry is allowed for each thermal overload protection

CONDITION		REQUIRED ACTION		COMPLETION TIME
Α.	One or more thermal overload protection devices inoperable.	A.1	Declare the affected valve inoperable.	Immediately
	devices inoperable.	<u>AND</u>		
		A.2	Enter the applicable Conditions and Required Actions for the affected valve.	Immediately

SURVEILLANCE REQUIREMENTS

TSR 3.8.b.1 applies to each thermal overload protection device in Table T3.8.b-1 (Table T3.8.b-2).

	SURVEILLANCE	EDEOLIENOV
	FREQUENCY	
TSR 3.8.b.1	A representative sample shall consist of ≥ 25% of all thermal overload protection devices such that:	
	1. Each device is calibrated at least once per 6 years, and	
	2. Each thermal overload is calibrated and each valve is cycled through at least one complete cycle of full travel with the motor operator when the thermal overload is OPERABLE at least once per 6 years.	
	Perform CHANNEL CALIBRATION of a representative sample of thermal overload devices.	18 months

Table T3.8.b-1 (page 1 of 3) Thermal Overload Protection Devices - Unit 1

VALVE NUMBER	FUNCTION
10G057A 10G079 10G080 10G081 10G082 10G083 10G084 10G085	OA H ₂ Recombiner Discharge Isolation Valve H ₂ Recombiner Discharge Containment Isolation Valve H ₂ Recombiner Suction Containment Isolation Valve H ₂ Recombiner Suction Containment Isolation Valve OA H ₂ Recombiner Discharge Containment Isolation Valve OA H ₂ Recombiner Discharge Containment Isolation Valve OA H ₂ Recombiner Containment Outlet Isolation Valve H ₂ Recombiner Containment Outlet Isolation Valve
1AF006A 1AF006B 1AF013A 1AF013B 1AF013C 1AF013D 1AF013F 1AF013F 1AF013G 1AF013H 1AF017A	1A AF Pump SX Suction Isolation Valve 1B AF Pump SX Suction Downstream Isolation Valve AF Motor Driven Pump Discharge Header Downstream Isolation Valve AF Motor Driven Pump Discharge Header Downstream Isolation Valve AF Motor Driven Pump Discharge Header Downstream Isolation Valve AF Motor Driven Pump Discharge Header Downstream Isolation Valve AF Diesel Driven Pump Discharge Header Downstream Isolation Valve AF Diesel Driven Pump Discharge Header Downstream Isolation Valve AF Diesel Driven Pump Discharge Header Downstream Isolation Valve AF Diesel Driven Pump Discharge Header Downstream Isolation Valve AF Diesel Driven Pump Discharge Header Downstream Isolation Valve AF Pump SX Suction Upstream Isolation Valve 1B AF Pump SX Suction Upstream Isolation Valve
1CC685 1CC9412A 1CC9412B 1CC9413A 1CC9413B 1CC9414 1CC9416 1CC9438 1CC9473A 1CC9473B	RCP Thermal Barrier Outlet Header Containment Isolation Valve CC to RHR HX 1A Isolation Valve CC to RHR HX 1B Isolation Valve RCPs CC Supply Downstream Containment Isolation Valve RCPs CC Supply Upstream Containment Isolation Valve CC Water from RCPs Isolation Valve Service Loop Isolation Valve CC Water from RCPs Isolation Valve CC Water from RCPs Isolation Valve CC Water from RCPs Isolation Valve Discharge Header X-tie Isolation Valve Discharge Header X-tie Isolation Valve
1CS001A 1CS001B 1CS007A 1CS007B 1CS009A 1CS009B 1CS019A 1CS019B	1A CS Pump Suction from RWST 1B CS Pump Suction from RWST 1A CS Pump Discharge Line Downstream Isolation Valve 1B CS Pump Discharge Line Downstream Isolation Valve 1A CS Pump Suction from 1A Recirc Sump 1B CS Pump Suction from 1B Recirc Sump CS Eductor 1A Suction Conn Isolation Valve CS Eductor 1B Suction Conn Isolation Valve

Table T3.8.b-1 (page 2 of 3) Thermal Overload Protection Devices - Unit 1

VALVE NUMBER	FUNCTION
1CV112B 1CV112C 1CV112D 1CV112E 1CV8100 1CV8104 1CV8105 1CV8106 1CV8111 1CV8111 1CV8112 1CV8355A 1CV8355B 1CV8355C 1CV8355D 1CV8804A	MOV VCT Outlet Upstream Isolation VCT Valve MOV VCT Outlet Downstream Isolation VCT Valve MOV RWST to Charging Pump Suction Header MOV RWST to Charging Pump Suction Header MOV RCP Seal Leakoff Header Isolation MOV Emergency Boration Valve MOV Charging Pumps Discharge Header Isolation Valve MOV Charging Pumps Discharge Header Isolation Valve MOV A & B Charging Pump Recirc Downstream Isolation MOV A & B Charging Pump Recirc Upstream Isolation MOV A & B Charging Pump Recirc Upstream Isolation MOV RCP Seal Water Return Isolation Valve MOV RCP 1A Seal Injection Inlet to Containment Isolation MOV RCP 1C Seal Injection Inlet Isolation MOV RCP 1D Seal Injection Isolation MOV RCP 1D Seal Injection Isolation MOV RCP 1D Seal Injection Isolation MOV RCR System X-Tie Valve to Charging Pump Suction Header A/B
1RH610 1RH611 1RH8701A 1RH8702A 1RH8701B 1RH8702B 1RH8716A 1RH8716B 1RY8000A 1RY8000B	1A RHR Pump Recirc Line Isolation Valve 1B RHR Pump Recirc Line Isolation Valve RC Loop 1A to RHR Pump Isolation Valve RC Loop 1C to RHR Pump Isolation Valve RC Loop 1A to RHR Pump Isolation Valve RC Loop 1C to RHR Pump Isolation Valve RC Loop 1C to RHR Pump Isolation Valve RHR HX 1RH02AA Downstream Isolation Valve RHR HX 1RH02AB Downstream Isolation Valve Pressurizer Relief Isolation Valve 1A Pressurizer Relief Isolation Valve 1B
1SI8801A 1SI8801B 1SI8802A 1SI8802B 1SI8804B 1SI8806 1SI8807A 1SI8807B 1SI8808B 1SI8808B 1SI8808C 1SI8808D 1SI8809B 1SI8811A 1SI8811A 1SI8811B 1SI8812A 1SI8812B 1SI8812B 1SI8812B 1SI8812B 1SI8812B 1SI8812B 1SI8812B 1SI8813 1SI8814 1SI8814 1SI8835 1SI8840 1SI8821A 1SI8821B 1SI8821B 1SI8821B 1SI8821B 1SI8821B 1SI8821B	SI Charging Pump Discharge Isolation Valve SI Charging Pump Discharge Isolation Valve 1A SI Pump Discharge Line Downstream Containment Isolation Valve 1B SI Pump Discharge Line Downstream Isolation Valve 1B SI Pump Suction X-tie from RHR HX SI Pumps Upstream Suction Isolation Valve SI to Charging Pump Suction X-tie Isolation Valve SI to Charging Pump Suction X-tie Isolation Valve Accumulator 1A Discharge Isolation Valve Accumulator 1B Discharge Isolation Valve Accumulator 1D Discharge Isolation Valve Accumulator 1D Discharge Isolation Valve SI RHR HX 1A Discharge Line Downstream Isolation Valve SI Containment Sump A Outlet Isolation Valve SI Containment Sump A Outlet Isolation Valve SI Containment Sump B Outlet Isolation Valve SI RWST to RH Pump 1A Outlet Isolation Valve SI RWST to RH Pump 1B Outlet Isolation Valve SI Pumps 1A-1B Recirc Line Downstream Isolation Valve SI Pumps 1A-1B Recirc Line Isolation Valve SI Pump Suction Discharge Line Upstream Containment Penetration Isolation Valve SI Pump Discharge Line V-tie Isolation Valve 1A SI Pump Discharge Line X-tie Isolation Valve 1B SI Pump Suction Isolation Valve

Table T3.8.b-1 (page 3 of 3) Thermal Overload Protection Devices - Unit 1

VALVE NUMBER	FUNCTION
1SX016B 1SX016A 1SX027A 1SX027B	RCFC B&D SX Supply MOV RCFC A&C SX Supply MOV RCFC A&C SX Return MOV RCFC B&D SX Return MOV
0SX007 0SX063A 0SX063B 0SX146 0SX147	CC HX Outlet Valve SX to Control Room Refrig Condenser OA SX to Control Room Refrig Condenser OB CC HX "O" Outlet Valve CC HX "O" Outlet Valve
15X001A 15X001B 15X004 15X005 15X007 15X010 15X011 15X033 15X034 15X136 15X150A 15X150B	1A SX Pump Suction Valve MOV 1B SX Pump Suction Valve MOV Unit 1 SX Supply to Unit 1 CCW HX MOV 1B SX Pump Supply to CCW HX "O" MOV CC HX Outlet Valve Unit 1 Train A Return Valve AB Train A Train B Unit 1 Return X-tie Valve AB 1A SX Pump Discharge X-tie MOV 1B SX Pump Discharge X-tie MOV Unit 1 Train B Return Valve AB SX Strainer 1A Backwash to Waste Treatment Building MOV SX Strainer 1B Backwash to Waste Treatment Building MOV
1W0006A 1W0006B 1W0020A 1W0020B 1W0056A 1W0056B	Chilled Water Coils 1A & 1C Supply Isolation Valve Chilled Water Coils 1B & 1D Supply Isolation Valve Chilled Water Coils 1A & 1C Return Isolation Valve Chilled Water Coils 1B & 1D Return Isolation Valve Chilled Water Containment Isolation Valve Chilled Water Containment Isolation Valve

Table T3.8.b-2 (page 1 of 3) Thermal Overload Protection Devices - Unit 2

VALVE NUMBER	FUNCTION
20G057A 20G079 20G080 20G081 20G082 20G083 20G084 20G085	OB H ₂ Recombiner Discharge Isolation Valve H ₂ Recombiner Discharge Containment Isolation Valve H ₂ Recombiner Suction Containment Isolation Valve H ₂ Recombiner Suction Containment Isolation Valve OB H ₂ Recombiner Discharge Containment Isolation Valve OB H ₂ Recombiner Discharge Containment Isolation Valve OB H ₂ Recombiner Containment Outlet Isolation Valve H ₂ Recombiner Containment Outlet Isolation Valve
2AF006A 2AF006B 2AF013A 2AF013B 2AF013C 2AF013D 2AF013E 2AF013F 2AF013G 2AF013H 2AF017A 2AF017B	2A AF Pump SX Suction Isolation Valve 2B AF Pump SX Suction Downstream Isolation Valve AF Motor Driven Pump Discharge Header Downstream Isolation Valve AF Motor Driven Pump Discharge Header Downstream Isolation Valve AF Motor Driven Pump Discharge Header Downstream Isolation Valve AF Motor Driven Pump Discharge Header Downstream Isolation Valve AF Diesel Driven Pump Discharge Header Downstream Isolation Valve AF Diesel Driven Pump Discharge Header Downstream Isolation Valve AF Diesel Driven Pump Discharge Header Downstream Isolation Valve AF Diesel Driven Pump Discharge Header Downstream Isolation Valve AF Diesel Driven Pump Discharge Header Downstream Isolation Valve 2A AF Pump SX Suction Upstream Isolation Valve 2B AF Pump SX Suction Upstream Isolation Valve
2CC685 2CC9412A 2CC9412B 2CC9413A 2CC9413B 2CC9414 2CC9415 2CC9416 2CC9438 2CC9473A 2CC9473B	RCP Thermal Barrier Outlet Header Containment Isolation Valve CC to RHR HX 2A Isolation Valve CC to RHR HX 2B Isolation Valve RCP CC Supply Downstream Containment Isolation RCPs CC Supply Upstream Containment Isolation CC Water from RCPs Isolation Valve Service Loop Isolation Valve CC Water from RCPs Isolation Valve CC Water from RCPs Isolation Valve CC Water from RCPs Isolation Valve Discharge Header X-tie Isolation Valve Discharge Header X-tie Isolation Valve
2CS001A 2CS001B 2CS007A 2CS007B 2CS009A 2CS009B 2CS019A 2CS019B	2A CS Pump Suction from RWST 2B CS Pump Suction from RWST 2A CS Pump Discharge Line Downstream Isolation Valve 2B CS Pump Discharge Line Downstream Isolation Valve 2A CS Pump Suction from 2A Recirc Sump 2B CS Pump Suction from 2B Recirc Sump CS Eductor 2A Suction Conn Isolation Valve CS Eductor 2B Suction Conn Isolation Valve

Table T3.8.b-2 (page 2 of 3) Thermal Overload Protection Devices - Unit 2

VALVE NUMBER	FUNCTION
2CV112B 2CV112C 2CV112D 2CV112E 2CV8100 2CV8104 2CV8105 2CV8106 2CV8110 2CV8111 2CV8112 2CV8355A 2CV8355B 2CV8355D 2CV8355D 2CV8355D	MOV VCT Outlet Upstream Isolation VCT Valve MOV VCT Outlet Downstream Isolation VCT Valve MOV RWST to Charging Pump Suction Header MOV RWST to Charging Pump Suction Header MOV RCP Seal Leakoff Header Isolation MOV Emergency Boration Valve MOV Charging Pumps Discharge Header Isolation Valve MOV Charging Pumps Discharge Header Isolation Valve MOV A & B Charging Pump Recirc Downstream Isolation MOV A & B Charging Pump Recirc Upstream Isolation RCP Seal Water Return Isolation Valve MOV RCP 2A Seal Injection Inlet to Containment Isolation MOV RCP 2B Seal Injection Inlet Isolation MOV RCP 2C Seal Injection Isolation MOV RCP 2D Seal Injection Isolation
2RH610 2RH611 2RH8701A 2RH8702A 2RH8701B 2RH8702B 2RH8716A 2RH8716B 2RY8000A 2RY8000B	2A RHR Pump Recirc Line Isolation Valve 2B RHR Pump Recirc Line Isolation Valve RC Loop 2A to RHR Pump Isolation Valve RC Loop 2C to RHR Pump Isolation Valve RC Loop 2A to RHR Pump Isolation Valve RC Loop 2C to RHR Pump Isolation Valve RC Loop 2C to RHR Pump Isolation Valve RHR HX 2RHO2AA Downstream Isolation Valve RHR HX 2RHO2AB Downstream Isolation Valve Pressurizer Relief Isolation Valve 2A Pressurizer Relief Isolation Valve 2B
2SI8801A 2SI8801B 2SI8802A 2SI8802B 2SI8804B 2SI8806 2SI8807A 2SI8807B 2SI8808A 2SI8808B 2SI8808C 2SI8808D 2SI8809B 2SI8811A 2SI8811A 2SI8811B 2SI8811B 2SI8812B 2SI8812B 2SI8812B 2SI8812B 2SI8813 2SI8814 2SI8814 2SI8814 2SI8814 2SI8814 2SI8814 2SI8814 2SI8814 2SI8814 2SI8814 2SI8818 2SI8814 2SI8821B 2SI8821B 2SI8821B	SI Charging Pump Discharge Isolation Valve SI Charging Pump Discharge Isolation Valve 2A SI Pump Discharge Line Downstream Containment Isolation Valve 2B SI Pump Discharge Line Downstream Isolation Valve 2B SI Pump Discharge Line Downstream Isolation Valve 2B SI Pump Suction X-tie from RHR HX SI Pumps Upstream Suction Isolation Valve SI to Charging Pump Suction X-tie Isolation Valve SI to Charging Pump Suction X-tie Isolation Valve Accumulator 2A Discharge Isolation Valve Accumulator 2B Discharge Isolation Valve Accumulator 2C Discharge Isolation Valve Accumulator 2D Discharge Isolation Valve SI RHR HX 2A Discharge Line Downstream Isolation Valve SI RHR HX 2B Discharge Line Downstream Isolation Valve SI Containment Sump A Outlet Isolation Valve SI Containment Sump A Outlet Isolation Valve SI RWST to RHR Pump 2A Outlet Isolation Valve SI RWST to RHR Pump 2B Outlet Isolation Valve SI Pumps 2A-2B Recirc Line Downstream Isolation Valve SI Pumps 2A-2B Recirc Line Isolation Valve SI Pump 2A Recirc Line Isolation Valve SI Pump Discharge Line Upstream Containment Penetration Isolation Valve 2A SI Pump Discharge Line X-tie Isolation Valve 2B SI Pump Discharge Line X-tie Isolation Valve 2B SI Pump Discharge Line X-tie Isolation Valve 2B SI Pump Suction Isolation Valve

Table T3.8.b-2 (page 3 of 3) Thermal Overload Protection Devices - Unit 2

VALVE NUMBER	FUNCTION
2SX016B 2SX016A 2SX027A 2SX027B	RCFC B&D SX Supply MOV RCFC A&C SX Supply MOV RCFC A&C SX Return MOV RCFC B&D SX Return MOV
0SX007 0SX063A 0SX063B 0SX146 0SX147	CC HX Outlet Valve SX to Control Room Refrig Condenser OA SX to Control Room Refrig Condenser OB CC HX "O" Outlet Valve CC HX "O" Outlet Valve
2SX001A 2SX001B 2SX004 2SX005 2SX007 2SX010 2SX011 2SX033 2SX034 2SX136	2A SX Pump Suction Valve MOV 2B SX Pump Suction Valve MOV Unit 2 SX Supply to Unit 2 CCW HX MOV 2B SX Pump Supply to CCW HX "O" MOV CC HX Outlet Valve Unit 2 Train A Return Valve AB Train A Train B Unit 2 Return X-tie Valve AB 2A SX Pump Discharge X-tie MOV 2B SX Pump Discharge X-tie MOV Unit 2 Train B Return Valve AB
2W0006A 2W0006B 2W0020A 2W0020B 2W0056A 2W0056B	Chilled Water Coils 2A & 2C Supply Isolation Valve Chilled Water Coils 2B & 2D Supply Isolation Valve Chilled Water Coils 2A & 2C Return Isolation Valve Chilled Water Coils 2B & 2D Return Isolation Valve Chilled Water Containment Isolation Valve Chilled Water Containment Isolation Valve

3.8 ELECTRICAL POWER SYSTEMS

3.8.c Battery Monitoring and Maintenance

TLCO 3.8.c Battery cell parameters for Division 11(21) and Division 12(22) batteries shall be within limits of Table T3.8.c-1.

APPLICABILITY: When associated DC electrical power subsystems are required to be OPERABLE.

ACTIONS

Separate Condition entry is allowed for each battery.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. One battery with one or more battery cell parameters not within Category A or B limits.	A.1	Verify pilot cell electrolyte level and float voltage meet Table T3.8.c-1 Category C limits.	1 hour
	<u>AND</u>		
	A.2	Verify battery cell	24 hours
		parameters meet Table T3.8.c-1 Category C limits.	AND
		111111111111111111111111111111111111111	Once per 7 days thereafter
	<u>AND</u>		
	A.3	Restore battery cell parameters to Category A and B limits of Table T3.8.c-1.	31 days
-	1		(continued)

ACTIONS	(continued)
ACTIONS	(COIL HIUEU

CONDITION		REQUIRED ACTION		COMPLETION TIME
В.	Required Actions B.1 and B.2 must be completed after LCO 3.8.6, "Battery Parameters," Required Action C.3 is	B.1 AND	Conduct an equalizing charge of the affected battery cell(s).	31 days
	One battery with one or more cells with electrolyte level less than the minimum established design limit.	B.2	Verify successful completion of appropriate testing for the affected cell(s).	31 days

SURVEILLANCE REQUIREMENTS

	FREQUENCY				
TSR 3.8.c.1	TSR 3.8.c.1 Verify battery cell parameters meet Table T3.8.c-1 Category A limits.				
		(continued)			

TSR 3.8.c.2	Verify battery cell parameters meet Table T3.8.c-1 Category B limits.	92 days	
		AND	
		Once within 7 days after a battery discharge < 110 V	
		AND	
		Once within 7 days after a battery overcharge > 145 V	
TSR 3.8.c.3	Verify no visible corrosion at battery terminals and connectors.	92 days	
	<u>OR</u>		
	Verify battery connection resistance is ≤ 150 micro-ohms for inter-cell connections, ≤ 150 micro-ohms for inter-rack		
	<pre>connections, ≤ 150 micro-ohms for inter-tier connections, and ≤ 150 micro-ohms for terminal connections.</pre>		
	AND		
	Verify total battery connection resistance is ≤ 3245 micro-ohms.		
TSR 3.8.c.4	Verify battery cells, cell plates, and racks show no visual indication of physical damage or abnormal deterioration that could degrade battery performance.	18 months	

SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
TSR 3.8.c.5	Remove visible terminal corrosion, verify battery cell to cell and terminal connections are clean and tight, and are coated with anti-corrosion material.	18 months
TSR 3.8.c.6	Verify battery connection resistance is ≤ 150 micro-ohms for inter-cell connections, ≤ 150 micro-ohms for inter-rack connections, ≤ 150 micro-ohms for inter-tier connections, and ≤ 150 micro-ohms for terminal connections. AND	18 months
	Verify total battery connection resistance is \leq 3245 micro-ohms.	

Table T3.8.c-1 (page 1 of 1) Battery Cell Parameters Requirements

PARAMETER	CATEGORY A: LIMITS FOR EACH DESIGNATED PILOT CELL	CATEGORY B: LIMITS FOR EACH CONNECTED CELL	CATEGORY C: ALLOWABLE LIMITS FOR EACH CONNECTED CELL
Electrolyte Level	≥ Minimum level indication mark, and ≤ ¼ inch above maximum level indication mark ^(a)	≥ Minimum level indication mark, and ≤ ¼ inch above maximum level indication mark ^(a)	Above top of plates, and not overflowing
Float Voltage	≥ 2.13 V	≥ 2.13 V ^(b)	> 2.07 V
Specific Gravity ^{(c)(d)}	≥ 1.200	\geq 1.195 AND Average of all connected cells $>$ 1.205	Not more than 0.020 below average of all connected cells $ \frac{\text{AND}}{\text{Average of all connected cells}} \geq 1.195 $

⁽a) It is acceptable for the electrolyte level to temporarily increase above the specified maximum during equalizing charges provided it is not overflowing.

⁽b) Corrected for average electrolyte temperature.

⁽c) Corrected for electrolyte temperature.

⁽d) A battery charging current of < 3 amps when on float charge is acceptable for meeting specific gravity limits following a battery recharge, for a maximum of 7 days. When charging current is used to satisfy specific gravity requirements, specific gravity of each connected cell shall be measured prior to expiration of the 7 day allowance.

3.9.a Decay Time

TLCO 3.9.a The reactor shall be subcritical for \geq the last 100 hours (\geq 95 hours for A2R16).

APPLICABILITY: During movement of irradiated fuel in the reactor vessel.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME	
A. Reactor subcritical for < 100 hours (< 95 hours for A2R16).	A.1 Suspend movement of irradiated fuel in the reactor vessel.	Immediately	

SURVEILLANCE REQUIREMENTS

	SURVEILLANCE	FREQUENCY
TSR 3.9.a.1	Verify the reactor subcritical \geq 100 hours (\geq 95 hours for A2R16) by confirming the date and time of subcriticality.	Prior to initial movement of irradiated fuel in the reactor vessel each outage

3.9.b Communications

TLCO 3.9.b Direct communications shall be maintained between the control room and personnel at the containment refueling station.

APPLICABILITY: During CORE ALTERATIONS.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME		
A. Direct communications not maintained.	A.1 Suspend CORE ALTERATIONS.	Immediately		

SURVEILLANCE REQUIREMENTS

	FREQUENCY	
TSR 3.9.b.1	Demonstrate direct communications between the control room and personnel at the containment refueling station.	Once within 1 hour prior to the start of CORE ALTERATIONS AND Once per 12 hours thereafter

3.9.c Refueling Equipment

TLCO 3.9.c The following refueling equipment shall be OPERABLE:

- 1. The refueling machine used for movement of fuel assemblies, and
- 2. The auxiliary hoist or reactor cavity maintenance crane used for latching and unlatching drive rods.

APPLICABILITY: During movement of drive rods or fuel assemblies within the reactor vessel.

ACTIONS

	CONDITION		REQUIRED ACTION	COMPLETION TIME	
Α.	Refueling machine inoperable.	A.1	Suspend use of the inoperable refueling machine from operations involving the movement of fuel assemblies within the reactor vessel.	Immediately	
В.	Required auxiliary hoist inoperable. OR Required reactor cavity maintenance crane inoperable.	B.1	Suspend use of the inoperable required auxiliary hoist or inoperable required reactor cavity maintenance crane from operations involving the movement of drive rods within the reactor vessel.	Immediately	

SURVEILLANCE REQUIREMENTS

JOHVETEE/MCE NE	14011/EITE						
	SURVEILLANCE						
TSR 3.9.c.1	 Verify refueling machine operability by: a. Performing a load test of ≥ 3563 pounds; and b. Demonstrating an automatic load cutoff when the crane load > 2850 pounds. 	Once within 100 hours prior to the start of movement of fuel assemblies within the reactor vessel					
TSR 3.9.c.2	Verify required auxiliary hoist or required reactor cavity maintenance crane and associated load indicator operability by performing a load test ≥ 2500 pounds.	Once within 100 hours prior to the start of movement of drive rods within the reactor vessel					

3.9.d Crane Travel — Spent Fuel Pool

TLC0	3.9.d	Loads	shall	be	limi	ted	to ≤	2000	pounds	when	traveling	over
		fuel	assemb ⁻	lies	in	the	spen	t fue	l pool.		-	

-----NOTES-----

- 1. Based on the design of the load block, the main hoist/load block is allowed to travel over the spent fuel pool.
- 2. Loads > 2000 pounds may be carried over the cask loading area provided they are carried by a SINGLE-FAILURE PROOF LOAD HANDLING SYSTEM.
- 3. Deviations from defined safe load paths for heavy loads require Plant Operations Review Committee approval. _____

APPLICABILITY: With fuel assemblies in the spent fuel pool.

ACTIONS

-----NOTE-----

TLCO 3.0.c is not applicable.

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. Load not within limit.	A.1	Place the crane load in a safe condition.	Immediately

SURVEILLANCE REQUIREMENTS

OUTVETED WAS TREGOTALITED				
SURVEILLANCE		FREQUENCY		
assemblies in th	erlocks prevent crane ls > 2000 pounds over fuel ne spent fuel pool, with the e cask loading area.	Once within 7 days prior to crane use AND Once per 7 days thereafter during crane operation		

3.9.e Refueling Cavity Water Level

TLCO 3.9.e Refueling cavity water level shall be maintained \geq 23 ft above the top of the reactor vessel flange.

APPLICABILITY: During movement of new fuel assemblies within containment.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Refueling cavity water level not within limit.	A.1 Suspend movement of new fuel assemblies within containment.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
TSR 3.9.e.1	Verify refueling cavity water level is ≥ 23 ft above the top of reactor vessel flange.	24 hours

5.0 ADMINISTRATIVE CONTROLS

5.1 Safety Limit Violation

- 5.1 The following actions shall be taken in the event a Safety Limit (Technical Specification 2.1.1 or 2.1.2) is violated:
 - a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour,
 - b. The Site Vice President and the Offsite Review and Investigative Function shall be notified within 24 hours,
 - c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the Onsite Review and Investigative Function. This report shall describe: (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action to prevent recurrence.
 - d. The Safety Limit Violation Report shall be submitted to the Commission, the Offsite Review and Investigative Function and the Site Vice President within 14 days of the violation, and
 - e. Critical operation of the Unit shall not be resumed until authorized by the Commission.

5.0 ADMINISTRATIVE CONTROLS

5.2 Procedures and Programs

5.2.a Process Control Program (PCP)

Written procedures shall be established, implemented, and maintained covering the activities of the PCP implementation.

The PCP shall contain the current formulas, sampling, analyses, tests, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

Changes to the PCP:

- 1. Shall be documented and records of reviews performed shall be retained for the duration of the unit Operating License. This documentation shall contain:
 - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and,
 - b. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, and other applicable regulations.
- 2. Shall become effective after review and acceptance by the Onsite Review and Investigative Function (Onsite Review) and the approval of the Station Manager.

5.2 Procedures and Programs

5.2.b <u>In-Plant Radiation Monitoring</u>

A program shall be established, implemented and maintained which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- 1. Training of personnel,
- 2. Procedures for monitoring, and
- 3. Provisions for maintenance of sampling and analysis equipment.

5.2.c <u>Radiological Environmental Monitoring Program</u>

A program shall be established, implemented and maintained which will monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the Offsite Dose Calculation Manual (ODCM), (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1. Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- 2. A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3. Participation in an Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the Quality Assurance Program for environmental monitoring.

5.2 Procedures and Programs

5.2.d <u>Radiation Protection Program</u>

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

5.2.e Offsite Dose Calculation Manual (ODCM)

The requirement for an ODCM program is contained in Technical Specification 5.5.1.

Changes to the ODCM shall become effective after review and acceptance by the Onsite Review and Investigative Function and the approval of the Station Manager on the date specified by the Onsite Review and Investigative Function.

5.0 ADMINISTRATIVE CONTROLS

5.3 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.3.a <u>Startup Report</u>

- 1. A summary report of plant startup and power escalation testing shall be submitted to the Commission following:
 (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level,
 (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and
 (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.
- 2. The Startup Report shall address each of the tests identified in the Updated Final Safety Analysis Report (UFSAR) and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.
- 3. Startup Reports shall be submitted within: (1) 90 days following completion of the Startup Test Program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of Startup Test Program, and resumption or commencement of commercial operation) supplementary reports shall be submitted at least every 3 months until all three events have been completed.

5.3 Reporting Requirements

5.3.b <u>Annual Specific Activity Report</u>

An Annual Report covering the activity of the facility for the previous calendar year shall be submitted to the Commission prior to March 1 of each year.

The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.16. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

5.3.c <u>Special Reports</u>

- 1. In the event the unit is in MODE 1 or 2 with $K_{\rm eff} \geq 1$ and with the Moderator Temperature Coefficient (MTC) more positive than the beginning of life limit specified in the COLR, a Special Report shall be prepared and submitted to the Commission within 10 days. The Special Report shall describe the value of the measured MTC, the interim control rod withdrawal limits, and the predicted average core burnup necessary for restoring the positive MTC to within its limit for the all rods withdrawn condition.
- 2. In the event an inoperable Main Control Room Radiation Outside Air Intake Monitor (ORE-PRO31B/32B or ORE-PRO33B/34B) is not restored to OPERABLE within 30 days, a Special Report shall be prepared and submitted to the Commission within the following 30 days. The Special Report shall describe the cause of the inoperability and the plans for restoration.

5.3 Reporting Requirements

5.3.c <u>Special Reports</u> (continued)

- 3. In the event the unit is in MODE 4, 5, or 6 with the reactor head on and either the PORVs, RHR suction relief valves, or the RCS vents are used to mitigate an RCS pressure transient, a Special Report shall be prepared and submitted to the Commission within 30 days. The Special Report shall describe the circumstances initiating the transient, the effect of the PORVs, RHR suction relief valves, or RCS vents on the transient, and any corrective action necessary to prevent recurrence.
- 4. In the event the unit is in MODE 1, 2, 3, or 4 and the ECCS is actuated and injects water into the RCS, a Special Report shall be prepared and submitted to the Commission within 90 days. The Special Report shall describe the circumstances of the actuation and the total accumulated actuation cycles to date. The current value of the usage factor for each affected Safety Injection nozzle shall be provided in this Special Report whenever its value exceeds 0.70.

(NOTE: If a Licensee Event Report (LER) has been provided to the NRC documenting the event and that report includes all of the requirements of the Special Report, no additional actions are required.)

ODCM AND RADIOLOGICAL CONTROLS REPORTS AND PROGRAM BRAIDWOOD

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1.6	ACCEPTANCE CRITERIA
1.7	LCOARS/COMPENSATORY MEASURES
1.8	REPORTING REQUIREMENTS
1.9	CHANGE CONTROL

1.1 <u>PURPOSE</u>

This Program provides guidance for the implementation of Technical Specification (TS) 5.5.1, "Offsite Dose Calculation Manual (ODCM)", 5.6.2, "Annual Radiological Environmental Operating Report", and 5.6.3, "Radioactive Effluent Release Report."

The ODCM contains the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and the conduct of the Radiological Environmental Monitoring Program. In addition, the ODCM contains the radioactive effluent controls, radiological environmental monitoring activities, and descriptions of the information that is included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports.

1.2 REFERENCES

- 1. Technical Specifications:
 - a. 5.5.1, "Offsite Dose Calculation Manual (ODCM)"
 - b. 5.6.2, "Annual Radiological Environmental Operating Report"
 - c. 5.6.3, "Radioactive Effluent Release Report"
- 2. US NRC 10CFR20.1302
- 3. US NRC 40CFR190
- 4. US NRC 10CFR50, Appendix I

1.3 <u>DEFINITIONS AND/OR ACRONYMS</u>

Offsite Dose Calculation Manual - ODCM

1.4 PROGRAM DESCRIPTION

The purpose of this Program is to ensure that methodologies, parameters, effluent controls, radiological monitoring, and reporting requirements are properly implemented by the ODCM or other approved plant procedures.

1.5 PROGRAM IMPLEMENTATION

- 1. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program.
- 2. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required in Reference 1.

The Chemistry Department shall have responsibility for the implementation, performance, completion and reporting of this Program.

1.6 ACCEPTANCE CRITERIA

Acceptance criteria is contained in the ODCM, plant implementing or surveillance procedures.

1.7 LCOARS/COMPENSATORY MEASURES

No LCOARs will be entered as a result of exceeding any acceptance criteria. Any corrective measures are contained in the ODCM or plant procedures. In addition, an Issue Report (IR) may need to be generated to provide proper tracking and resolution of noted problems associated with the implementation of this Program.

1.8 REPORTING REQUIREMENTS

1. Annual Radiological Environmental Operating Report covering the operation of the facility during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the ODCM, and Reference 4.

2. The Radioactive Effluent Release Report covering the operation of the facility during the previous year shall be submitted prior to May 1 of each year in accordance with 10CFR50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the facility. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10CFR50.36a and Reference 4.

A single submittal may be made for the facility. The submittal should combine sections common to both units.

The Chemistry Department is responsible for preparing and submitting the subject reports.

1.9 <u>CHANGE CONTROL</u>

Changes to the ODCM shall be documented and records of reviews performed shall be retained. As a minimum, the documentation shall contain:

- 1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s); and
- 2. a determination that the change(s) maintain the levels of radioactive effluent control required by References 2, 3, 4, and 10CFR50.36a and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

Changes to the ODCM are effective upon approval of the Plant Manager or designee.

Changes to the ODCM shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

Changes to this Program, other than editorial changes, shall include a 10CFR50.59 Review and a Station Qualified Review (SQR). The SQR composition shall include Regulatory Assurance Department in all cases. As a part of the SQR, Byron and Braidwood Plant Operations Review Committee (PORC) approval is required as determined by the Regulatory Assurance Manager. Byron and Braidwood shall implement the same change unless the change being implemented at Braidwood has been reviewed and was determined not to be applicable to Byron.

PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT BRAIDWOOD

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1.9	CHANGE CONTROL

1.1 <u>PURPOSE</u>

The purpose of this Program is to verify leakage tests are performed on each system or portion of systems outside containment that could potentially contain highly radioactive fluids or gases, pursuant to Technical Specification (TS) 5.5.2, "Primary Coolant Sources Outside Containment". This Program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to level as low as practicable.

1.2 References

- 1. Technical Specifications 5.5.2, "Primary Coolant Sources Outside Containment"
- 2. UFSAR Appendix E.77 (UFSAR), "Primary Coolant Sources Outside Containment (III.D.1.1)"
- 3. NUREG 0737.III.D.1.1, "Integrity of Systems Outside Containment Likely to Contain Radioactive Material for Pressurized-Water Reactors and Boiling-Water Reactors"
- 4. NRC Generic Letter 88-05, "Boric Acid Corrosion of Carbon Steel Reactor Pressure Boundary Components in PWR Plants"

1.3 DEFINITIONS AND ACRONYMS

- 1. INDICATION The response from the application of a visual examination (VT-2).
- 2. VT-2 (Visual Examination) An inspection of an ASME/NUREG System component at normal system operating pressure.

1.4 PROGRAM DESCRIPTION

This Program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the recirculation portions of the Containment Spray, Safety Injection, Chemical and Volume Control, and Residual Heat Removal.

1.5 <u>PROGRAM IMPLEMENTATION</u>

This Program determines, through the associated implementing procedures, that leakage sources outside containment will be accounted for to insure the total amount will not exceed the UFSAR acceptable limits for Braidwood Station. The bases for this Program were established per References 2 and 3 that provide for the following:

- 1. Monitor the leak testing of piping so that the appropriate lines are examined at least once per 18 months on each System or portions of Systems;
- 2. Direct leak test examinations such that systems are tested at approximate operating pressure or higher;
- 3. Align systems such that all piping tested is properly pressurized;
- 4. Identify lines that contain gases that require pressure decay and/or metered makeup testing;
- 5. Quantify results of leakage examinations;
- 6. Initiate corrective action; and
- 7. Preventive maintenance in accordance with approved plant procedures consistent with the Braidwood Maintenance Rule.

The Engineering Programs Group shall have responsibility for the completion of this Program.

1.6 ACCEPTANCE CRITERIA

- 1. All examinations required by this Program are completed at least once per 18 months. The provisions of SR 3.0.2 are applicable.
- 2. Cumulative leakage shall be within the acceptable range specified per UFSAR Table 15.6-13.

1.7 <u>LCOARS/COMPENSATORY MEASURES</u>

Any examinations exceeding acceptance criteria shall be immediately conveyed to the Shift Manager. The Shift Manager shall determine the OPERABILITY status and implement a LCOAR if applicable. In addition, an Issue Report may need to be generated to provide proper tracking and resolution of noted problems associated with the implementation of this Program.

1.8 <u>REPORTING REQUIREMENTS</u>

Any examinations exceeding acceptance criteria will be coordinated/reported in accordance with the requirements of the Maintenance Rule Program.

1.9 CHANGE CONTROL

Changes to this Program, other than editorial changes, shall include a 10CFR50.59 Review and a Station Qualified Review (SQR). The SQR composition shall include the Regulatory Assurance Department in all cases. As a part of the SQR, Byron and Braidwood Plant Operations Review Committee (PORC) approval is required as determined by the Regulatory Assurance Manager. Byron and Braidwood shall implement the same change unless the change being implemented at Braidwood has been reviewed and determined not to be applicable to Byron.

RADIOACTIVE EFFLUENT CONTROLS PROGRAM BRAIDWOOD

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1.8	REPORTING REQUIREMENTS
1.9	CHANGE CONTROL

1.1 PURPOSE

This Program is in compliance with Technical Specification (TS) 5.5.4, "Radioactive Effluent Controls Program." This Program provides controls for radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The Program shall be contained in the Offsite Dose Calculation Manual (ODCM) which is implemented by plant procedures which also include remedial actions taken whenever the acceptance criteria is exceeded.

1.2 <u>REFERENCES</u>

- 1. Technical Specifications 5.5.4, "Radioactive Effluent Controls Program"
- 2. Offsite Dose Calculation Manual (ODCM)
- 3. US NRC 10CFR20, Appendix B, Table 2, Column 2
- 4. US NRC 10CFR20.1302
- 5. US NRC 10CFR50, Appendix I
- 6. US NRC 40CFR190

1.3 <u>DEFINITIONS AND/OR ACRONYMS</u>

Offsite Dose Calculation Manual - ODCM

1.4 PROGRAM DESCRIPTION

This Program ensures that appropriate plant procedures, along with the ODCM are implemented for radioactive effluent controls. These controls are to be maintained in accordance with the guidance provided by referenced NRC requirements. This Program provides the general guidance for surveillance testing, monitoring, setpoint determination, exposure limits, and reporting requirements.

1.5 <u>PROGRAM IMPLEMENTATION</u>

This Program shall be implemented by plant procedures or the ODCM which will include at least the following:

- 1. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in Reference 2;
- 2. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to 10 times the concentrations stated in Reference 3:
- 3. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with Reference 4 and with the methodology and parameters per Reference 2;
- 4. Limitations on the quarterly and annual doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to Reference 5;
- 5. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in Reference 2, Section 12 at least every 31 days;
- 6. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to Reference 5;
- 7. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary conforming to the acceptance criteria.

- 8. Limitations on the quarterly and annual air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to Reference 5.
- 9. Limitations on the quarterly and annual doses to a member of the public from Iodine-131, Iodine-133, Tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to Reference 5; and
- 10. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to Reference 6.

The Chemistry Department shall have responsibility for the implementation, performance, completion, and reporting of this Program.

1.6 ACCEPTANCE CRITERIA

All acceptance criteria pertaining to this Program is located in the ODCM, implementing, or surveillance procedures.

1.7 LCOARS/COMPENSATORY MEASURES

An Issue Report (IR) may need to be generated to provide proper tracking and resolution of noted problems associated with the implementation of this Program..

1.8 REPORTING REQUIREMENTS

Any reporting requirements are listed in the ODCM and implementing procedures.

1.9 CHANGE CONTROL

Changes to this Program, other than editorial changes, shall include a 10CFR50.59 Review and a Station Qualified Review (SQR). The SQR composition shall include Regulatory Assurance Department in all cases. As a part of the SQR, Byron and Braidwood Plant Operations Review Committee (PORC) approval is required as determined by the Regulatory Assurance Manager. Byron and Braidwood shall implement the same change unless the change being implemented at Braidwood has been reviewed and was determined not to be applicable to Byron.

TRANSIENT MONITORING PROGRAM BRAIDWOOD

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1.9	CHANGE CONTROL

1.1 <u>PURPOSE</u>

The purpose of this Program is to provide guidance for tracking the number of cycles of specific transients and to ensure operation within the Braidwood Plant Design Basis is in accordance with Technical Specifications (TS) 5.5.5, "Component Cyclic or Transient Limit."

The minimum requirements for cyclic or transient tracking are those transients listed in Attachment 1 of this Program. These items, in addition to various other monitored parameters or transients, will be tracked periodically in accordance with appropriate Plant Procedures.

Components affected by the transients monitored are typically ASME Section III Code Class 1 vessels. The design of such components includes cyclic/fatigue assumptions which must be tracked to ensure that the unit is operating within its design basis. Piping and components designed to ANSI B31.1, Power piping does not generally require fatigue monitoring as those considerations are inherent to the safety margins applied by that Code.

1.2 REFERENCES

- 1. TS Specification 5.5.5, "Component Cyclic or Transient Limit"
- 2. Updated Final Safety Analysis Report, (UFSAR), Section 3.9 and 5.2
- 3. 10CFR50, Appendix A
- 4. "WCAP-12235, General Guidelines for Nuclear Power Plant Transient and Fatigue Monitoring", March, 1989

1.3 DEFINITION AND/OR ACRONYMS

Not applicable.

1.4 <u>PROGRAM DESCRIPTION</u>

This Program ensures that appropriate plant procedures are implemented to monitor transients that may have an affect on ASME Section III Code Class 1 vessels/components as specified in Reference 2.

Attachment 1 provides component cyclic or transient limits as well as design cycle or transient parameters for specific plant components. Monitoring of additional equipment/parameters not listed in Attachment 1 may be performed as a good practice on an as needed basis, and are not considered within the scope of this Program though they may be tracked using appropriate Plant Procedures, Implementing procedures shall have adequate measures to identify cumulative cyclic/transient conditions requiring further analysis prior to the design basis limits being reached. In the event any of the limits are approached or exceeded, required actions or reporting requirements are specified in this Program or appropriate Plant Procedures.

1.5 PROGRAM IMPLEMENTATION

Specific plant procedures have been developed and implemented in order to perform the following:

- 1. Provide a tracking program for the relevant transient cycles/trips for those ASME Section III Code Class 1 components specified in Reference 2.
- 2. Periodically monitor components identified in Attachment 1 for code compliance relative to parameters such as, transient limits and usage factors.

System Engineering Department shall have responsibility for the implementation, performance, completion, and reporting of this Program.

1.6 ACCEPTANCE CRITERIA

1. Attachment 1 provides cyclic or transient limit acceptance criteria for each component within the scope of this Program.

2. Should the design basis limits be approached or exceeded, an evaluation and recommended operating restrictions (if any) will be provided by Site Engineering - Mechanical. Any recommendations to modify design limits shall be accompanied by a safety evaluation.

1.7 LCOARS/COMPENSATORY MEASURES

In the event that a component has reached its administrative cyclic or transient limit, the Shift Manager shall be notified immediately. The Shift Manager shall determine OPERABILITY status and implement a LCOAR if applicable. In addition, a Problem Identification Form (PIF) may need to be generated to provide proper tracking and resolution of noted problems associated with the implementation of this Program.

1.8 REPORTING REQUIREMENTS

1. A special report will be generated whenever cyclic or transient limits are being approached or exceeded. This report shall be generated and distributed, as a minimum to the following:

PORC (Plant Operations Review Committee) Site V.P. - Braidwood Plant Manager Operations Manager Engineering Manager

2. Any violations of the cyclic or transient limits shall be reported to the NRC in accordance with 10CFR50.71 and 10CFR50.72.

1.9 CHANGE CONTROL

Changes to this Program, other than editorial, shall include a 10CFR50.59 evaluation and an Independent Technical Review (ITR). The ITR composition shall include Regulatory Assurance Department in all cases. As a part of the ITR, for a change to this Program, concurrence from Byron Station and Braidwood Plant Operations Review Committee (PORC) approval is required. The concurrence shall be that Byron Station is implementing the same change or that the change has been reviewed and determined not to be applicable to Byron Station.

ATTACHMENT 1

COMPONENT CYCLIC OR TRANSIENT LIMITS

COMPONENT	CYCLIC OR TRANSIENT LIMIT	DESIGN CYCLE OR TRANSIENT
Reactor Coolant System	200 heatup cycles at ≤ 100°F/h and 200 cool-down cycles at < 100 °F/h.	Heatup cycle - T_{avg} from $\leq 200^{\circ}F$ to $\geq 550^{\circ}F$. Cooldown cycle - T_{avg} from $\geq 550^{\circ}F$ to $\leq 200^{\circ}F$.
	200 pressurizer cooldown cycles at ≤ 200°F/h.	Pressurizer cooldown cycle temperature from ≥ 650°F to ≤ 100°F.
	80 loss of load cycles, without immediate Turbine or Reactor Trip.	≥ 15% of RATED THERMAL POWER to 0% of RATED THERMAL POWER.
	40 cycles of loss-of-offsite A.C. electrical power.	Loss-of-Offsite A.C. electrical ESF Electrical System.
	80 cycles of loss of flow in one reactor coolant loop.	Loss of only one reactor coolant pump.
	400 Reactor trip cycles.	100% to 0% of RATED THERMAL POWER.
	10 auxiliary spray actuation cycles.	Spray water temperature differential > 320°F.
	200 leak tests.	Pressurized to ≥ 2485 psig.
	10 hydrostatic pressure tests.	Pressurized to \geq 3107 psig.
Secondary Coolant System	1 large steam line break.	Break in a > 6 inch steam line.
	10 hydrostatic pressure tests.	Pressurized to ≥ 1481 psig.

PRE-STRESSED CONCRETE CONTAINMENT TENDON SURVEILLANCE PROGRAM BRAIDWOOD

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1.7	LCOAR/COMPENSATORY MEASURES
1.8	REPORTING REQUIREMENTS
1.9	CHANGE CONTROL

1.1 <u>PURPOSE</u>

This Program provides controls for monitoring any tendon degradation in the pre-stressed concrete containments and is pursuant to Technical Specifications (TS) 5.5.6 and 5.6.8.

1.2 REFERENCES

- 1. Technical Specifications:
 - a. 5.5.6, "Pre-Stressed Concrete Containment Tendon Surveillance Program"
 - b. 5.6.8, "Tendon Surveillance Report"
- 2. USFAR Section 3.8.1.7.3.2, "Inservice Tendon Surveillance Program"
- 3. U.S. NRC 10 CFR 50.55a
- 4. U.S. NRC Regulatory Guide 1.35.1, "Determining Pre-Stressing Forces For Inspection of Pre-Stressed Concrete Containments," dated July 1990
- 5. ASME Boiler and Pressure Vessel Code, Section XI, Sub-Section IWL
- 6. Drawings:
 - a. S884: Containment Building Tendon Location Plans and Sections
 - b. Inland Ryerson Company Drawings 781 / 782 through 781 / 782-23
 - c. Braidwood Station In Service Inspection Drawings for Containment Tendons
- 7. Braidwood SER Section 3.8.1
- 8. Braidwood Maintenance Rule 10 CFR 50.65

1.3 <u>DEFINITIONS AND/OR ACRONYMS</u>

- 1. TENDON The bundle of wire assemblies and anchorages that maintain pre-stressed forces within the containment structure.
- 2. ANCHORAGE The components at each end of the wire bundle that are used to maintain the required prestressed forces and distribute the forces within the tendon.
- 3. LIFT OFF FORCE The force required to lift the containment tendon anchorage from the shim stack or structure.
- 4. SHEATHING FILLER GREASE The corrosion protection medium that encases the tendon and anchorage.

1.4 PROGRAM DESCRIPTION

The Pre-Stressed Concrete Containment Tendon Surveillance Program provides a standardized methodology to ensure that aging and degradation issues are identified early and monitored through the following activities:

- 1. Measuring, recording, and evaluating the lift off force for tendons included in the test sample population;
- 2. Ensuring the containment vessel, tendon anchorages, and tendon wires do not exhibit signs of abnormal degradation;
- 3. Ensuring the tendon wires continue to maintain the required integrity through physical testing; and
- 4. Ensuring the sheathing filler grease continues to protect the tendon components from corrosion by identification of free water and chemical analysis of the sheathing filler grease.

1.5 <u>PROGRAM IMPLEMENTATION</u>

Inspection schedules, examination and testing methods, personnel qualification requirements, and reporting requirements shall be established, implemented, and maintained in accordance with Section XI, Subsection IWL of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50.55(a) except where alternative, exemption or relief has been authorized by the NRC. The Engineering Programs Group shall have the responsibility for all aspects of the Program.

The detection of degradation of the containment structure or trending shall be coordinated with the requirements of the Maintenance Rule.

1.6 <u>ACCEPTANCE CRITERIA</u>

Acceptance criteria for the Braidwood Pre-Stressed Concrete Containment Tendon Surveillance Program is contained in appropriate Plant Procedures as described in the Braidwood Containment Inservice Inspection (CISI) Program Plan.

1.7 <u>LCOARS / COMPENSATORY MEASURES</u>

In the event the acceptance criteria is exceeded, immediately notify the Shift Manager. In addition, the issue shall be entered into the Corrective Action Program to provide proper tracking and resolution of noted problems associated with the implementation of this Program. Engineering shall determine if the condition that exceeded the acceptance criteria renders the containment inoperable. In the event the containment is found to be inoperable, the Shift Manager shall be immediately notified and the Shift Manager shall implement the applicable LCOAR.

1.8 REPORTING REQUIREMENTS

- 1. Items which do not meet the acceptance criteria shall be evaluated by Engineering and an Engineering Evaluation Report shall be prepared. The Engineering Evaluation Report(s) shall be maintained at the site and are subject to review by the regulatory and enforcement authorities.
 - a. The Engineering Evaluation Report shall be in accordance with the ASME Code Section XI, IWL Subsection.

- 2. The following conditions shall also be reported in the ISI Summary Report required by ASME Section XI, IWA6000 when:
 - a. The elongation corresponding to a specific load (adjusted for effective wires or strands) during re-tensioning of the tendons differs by more than 10 percent from that recorded during the last measurement;
 - b. The Sheathing Filler Grease Analysis contains chemically combined water exceeding 10 percent by weight;
 - c. The presence of free water is identified in the sheathing filler grease;
 - d. The absolute difference between the amount of sheathing filler grease removed during inspection and testing and the amount replaced thereafter exceeds 10 percent of the tendon duct volume; or
 - e. Grease leakage is detected during general visual examination of the containment surface.

1.9 CHANGE CONTROL

Changes to this Program, other than editorial changes, shall include a 10 CFR 50.59 Review and a Station Qualified Review (SQR). The SQR composition shall include the Regulatory Assurance Department in all cases. As part of the SQR, Byron and Braidwood Plant Operations Review Committee (PORC) approval is required as determined by the Regulatory Assurance Manager. Byron and Braidwood shall implement the same change unless the change being implemented at Braidwood has been reviewed and was determined not to be applicable to Byron.

REACTOR COOLANT PUMP FLYWHEEL INSPECTION PROGRAM BRAIDWOOD

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1.8	REPORTING REQUIREMENTS
1.9	CHANGE CONTROL

1.1 PURPOSE

The purpose of this Program is to verify the structural integrity of each Reactor Coolant Pump Flywheel pursuant to Technical Specification (TS) 5.5.7, "Reactor Coolant Pump Flywheel Inspection Program." This Program provides for the inspection of each reactor coolant pump flywheel in general conformance with Reference 5 as modified by References 12 and 13.

1.2 REFERENCES

- 1. Technical Specification 5.5.7, "Reactor Coolant Pump Flywheel Inspection Program"
- 2. UFSAR:
 - a. Section 5.4.1.5.2
 - b. Appendix A
- 3. 10CFR50 Appendix A and B
- 4. NUREG-0800, Section 5.4.1.1, "Pump Flywheel Integrity"
- 5. Regulatory Guide 1.14, "Reactor Coolant Pump Flywheel Integrity"
- 6. Braidwood Station Units 1 and 2 Inservice Inspection Program Plan
- 7. Westinghouse WCAP-8163, "Topical Report on Reactor Coolant Pump Integrity in LOCA"
- 8. Westinghouse Vendor Manual F-198, "Reactor Coolant Pump"

- 9. Braidwood SER Sections:
 - a. 2.2.4
 - b. 3.5.1.2
 - c. 5.4.1
- 10. Braidwood Station Maintenance Rule Program
- 11. Westinghouse WCAP-14535A, "Topical Report on Reactor Coolant Pump Flywheel Inspection Elimination"
- 12. Mahesh Chawla to O.D. Kingsley, "Issuance of Amendments Byron Station, Units 1 and 2 and Braidwood Station, Units 1 and 2 Request for Technical Specifications Change Revision to the Reactor Coolant Pump Flywheel Inspection Program," dated September 21, 2001.
- 13. Marshall David to M.J. Pacilio, "Braidwood Station, Units 1 and 2, and Byron Station, Unit Nos. 1 and 2 Issuance of Amendments RE: Extension of Inspection Interval for Reactor Coolant Flywheels (TAC Nos. ME3640, ME3641, ME3642, and ME3643), dated September 16, 2010.

1.3 DEFINITIONS AND/OR ACRONYMS

- 1. UT Ultrasonic Testing
- 2. SURFACE EXAMINATION Examination method using liquid penetrant (PT) or magnetic particle (MT) techniques.
- 3. INDICATION The response from the application of a nondestructive examination (NDE).
- 4. RELEVANT INDICATION OR FLAW An imperfection or unintentional discontinuity that is detectable by NDE.
- 5. DEFECT A flaw of such size, shape, orientation, location, or properties as to be rejectable.

1.4 PROGRAM DESCRIPTIONS

One of the following examinations shall be performed on each reactor coolant pump flywheel at the specified frequency:

- 1. A qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle of half the outer radius <u>or</u>
- 2. A surface examination (MT or PT) of the bore and keyway area whenever the flywheels are removed for maintenance purposes. Since the exposed surfaces, other than the bore and keyway areas, of the flywheels are coated with corrosion preventative primer paint, a surface examination of these surfaces is not practicable.
- 3. For reactor coolant pump motor serial numbers 4S88P961 and 1S88P961, in lieu of Regulatory Position c.4.b(1) and c.4.b(2), a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination (MT and/or PT) of exposed surfaces of the removed flywheel may be conducted at approximately 10 year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI.

For all other reactor coolant pump motors, in lieu of Regulatory Position c.4.b(1) and c.4.b(2), a qualified inplace UT examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination (MT and/or PT) of exposed surfaces of the removed flywheel may be conducted at an interval not to exceed 20 years.

1.5 PROGRAM IMPLEMENTATION

Inspection schedules, personnel, equipment and material certifications, applicable examination methods, and examination reports shall be initiated and maintained in accordance with Braidwood Unit 1 and 2 Inservice Inspection Program Plan and associated procedures.

The Engineering Programs Group shall have responsibility for the implementation, performance, completion, and reporting of this Program.

1.6 ACCEPTANCE CRITERIA

1. All relevant indications shall be recorded on the appropriate examination form.

2. Final disposition of flaws shall be based on engineering analysis.

1.7 <u>LCOARS/COMPENSATORY MEASURES</u>

In the event indication(s) exceed allowable length, the Shift Manager shall be notified immediately. The Shift Manager shall determine OPERABILITY status and implement a LCOAR if applicable. In addition, an Issue Report (IR) may need to be generated to provide proper tracking and resolution of noted problems associated with the implementation of this Program.

1.8 <u>REPORTING REQUIREMENTS</u>

- 1. If the examination and evaluation indicate an increase in flaw size or growth rate greater than predicted for the service life of the flywheel, the results of the examination and evaluation should be submitted to the NRC for evaluation.
- 2. The detection of flaws that exceed the acceptance criteria standards shall be coordinated with the requirements of the Maintenance Rule Program.

1.9 CHANGE CONTROL

Changes to this Program, other than editorial changes, shall include a 10 CFR 50.59 Review and a Station Qualified Review (SQR). The SQR composition shall include Regulatory Assurance Department in all cases. As a part of the SQR, Byron and Braidwood Plant Operations Review Committee (PORC) approval is required as determined by the Regulatory Assurance Manager. Byron and Braidwood shall implement the same change unless the change being implemented at Braidwood has been reviewed and was determined not to be applicable to Byron.

INSERVICE TESTING PROGRAM BRAIDWOOD

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1.8	REPORTING REQUIREMENTS
1.9	CHANGE CONTROL

1.1 PURPOSE

The purpose of this Program is to perform Inservice Testing of ASME Code Class 1, 2, and 3 pumps and valves, pursuant to Technical Specifications 5.5.8, "Inservice Testing Program."

1.2 REFERENCES

- 1. Technical Specifications Section 5.5.8, "Inservice Testing Program"
- 2. Updated Final Analysis Report (UFSAR) Section, 3.9.6, "Inservice Testing of Pumps and Valves"
- 3. USNRC Generic Letter GL 89-04, "Guidance on Developing Acceptable IST Programs"
- 4. USNRC Regulatory Guides
- 5. USNRC Bulletins (IEB)
- 6. 10CFR Part 50.55a Codes and Standards
- 7. ASME OM Code
- 8. Braidwood Inservice Testing Program Plan Pumps and Valves

Additional references and descriptions of the Codes along with the Addenda applicable to the Inservice Testing Program for pumps and valves are provided in the Braidwood Inservice Testing Program Plan Pumps and Valves.

1.3 DEFINITIONS AND/OR ACRONYMS

American Society of Mechanical Engineers - ASME

1.4 PROGRAM DESCRIPTION

Inservice Testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with the ASME OM Code and applicable addenda as required by 10CFR Part 50, Section 50.55a(f), except where specific written relief has been granted by the Commission pursuant to 10CFR Part 50, Section 55a(f)(6)(i) or Section 55a(a)(3).

The Braidwood Inservice Testing Program Plan Pumps and Valves contains the list of pumps and valves in the Program and the tests and test frequencies associated with each pump and valve. The Program Plan also contains justifications for testing at frequencies other than the ASME Code required frequencies, technical positions, and relief requests from ASME Code requirements which are determined to be impractical. The Program Plan also describes the Codes and Addenda applicable to the Braidwood Inservice Testing Program. The Program Plan is submitted to the NRC.

Surveillance intervals for Inservice Testing activities shall be as applicable as identified in Reference 1.

1.5 PROGRAM IMPLEMENTATION

The pump and valve testing described in the Inservice Testing Program Plan are implemented through station surveillance procedures. Administrative procedures are also used to implement Program requirements. The Engineering Department is responsible for the Inservice Testing Program Plan Pumps and Valves. The Departments who own the specific station surveillance procedures are responsible for scheduling and implementing those surveillances.

1.6 ACCEPTANCE CRITERIA

The acceptance criteria for the Inservice Testing pump and valve tests is contained in the implementing surveillance procedures.

1.7 LCOARS/COMPENSATORY MEASURES

In the event a surveillance is failed, the Shift Manager shall be notified immediately. The Shift Manager shall determine the OPERABILITY status and implement a LCOAR if applicable. In addition, an Issue Report (IR) may need to be generated to provide proper tracking and resolution of noted problems associated with the implementation of this Program.

1.8 <u>REPORTING REQUIREMENTS</u>

Pump and valve test records shall be maintained at the plant.

1.9 CHANGE CONTROL

Changes to this Program, other than editorial changes, shall include a 10CFR50.59 Review and Station Qualified Review (SQR). The SQR composition shall include Regulatory Assurance Department in all cases. As a part of the SQR, Byron and Braidwood Plant Operations Review Committee (PORC) approval is required as determined by the Regulatory Assurance Manager. Byron and Braidwood shall implement the same changes to Appendix H unless the change being implemented at Braidwood has been reviewed and determined no to be applicable to Byron.

STEAM GENERATOR PROGRAM BRAIDWOOD

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1.1 PURPOSE

This Program verifies the tube integrity of the Steam Generators (SGs) by performing inspections and tube plugging in accordance with Technical Specification (TS) 3.4.19, "Steam Generator (SG) Tube Integrity," and the Steam Generator Program. The Steam Generator Program is defined by TS 5.5.9, NEI 97-06 and its associated EPRI Steam Generator Management Program Guidelines. TS 5.6.9, "Steam Generator (SG) Tube Inspection Reports," provides the SG reporting requirements.

1.2 <u>REFERENCES</u>

- 1. Technical Specifications:
 - a. 5.5.9, "Steam Generator (SG) Program"
 - b. 5.6.9, "Steam Generator (SG) Tube Inspection Reports"
 - c. 3.4.13, "RCS Operational LEAKAGE"
 - d. 3.4.19, "Steam Generator (SG) Tube Integrity"
- 2. Update Final Safety Analysis Report Sections:
 - a. 5.4.2, "Steam Generators"
 - b. 15.1.5, "Steam System Piping Failure"
 - c. 15.6.3. "Steam Generator Tube Rupture"
- 3. Exelon Generation Company, LLC, Quality Assurance Topical Report
- 4. ASME Boiler and Pressure Vessel Code:
 - a. Section V, Nondestructive Examination, 2001 Edition through 2003 Addenda
 - b. Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components, 2001 Edition through 2003 Addenda
- 5. American Society for Nondestructive Testing (ASNT):
 "Standard for Qualification and Certification of
 Nondestructive Testing Personnel, CP-189, 1995 Edition"

- 6. General Design Criteria (GDC) of Appendix A to 10CFR50:
 - a. GDC-14
 - b. GDC-15
 - c. GDC-30
 - d. GDC-31
 - e. GDC-32
- 7. Nuclear Energy Institute (NEI) Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-449, Revision 4
- 8. Draft Regulatory Guide 1.121, "Bases for Plugging Degraded PWR Steam Generator Tubes"
- 9. Maintenance Rule Performance Criteria RC-2, "Remove Heat from Reactor to Steam Generators Including Steam Generator Integrity"
- 10. NEI 97-06 Steam Generator Program Guidelines
- 11. EPRI PWR Steam Generator Examination Guidelines
- 12. EPRI Primary to Secondary Leak Guidelines
- 13. EPRI Steam Generator Integrity Guidelines
- 14. EPRI Steam Generator In Situ Pressure Test Guidelines
- 15. EPRI Steam Generator Secondary Water Chemistry Guidelines
- 16. EPRI Steam Generator Primary Water Chemistry Guidelines

1.3 DEFINITIONS AND/OR ACRONYMS

1. IMPERFECTION - An exception to the dimensions, finish or contour of a tube from that required by fabrication drawings or specifications. Eddy current testing indications <20% of the nominal wall thickness, if detectable, may be considered as imperfections.

- 2. DEGRADATION A service induced cracking, wastage, wear or general corrosion occurring on either inside or outside of a tube.
- 3. DEGRADED TUBE A tube containing unrepaired imperfections ≥20% of the nominal tube wall thickness caused by degradation.
- 4. DEFECT An imperfection of such severity that it exceeds the plugging or repair limit. A tube containing a defect is defective.
- 5. PLUGGING or REPAIR LIMIT The imperfection depth at or beyond which the tube shall be removed from service by plugging. The plugging or repair limit imperfection depth for the tubing is equal to 40% of the nominal wall thickness.

For Unit 2 only, this definition does not apply to service-induced flaws identified in the portion of the tube below 14.01 inches from the top of the tubesheet. Service-induced flaws found in the portion of the tube below 14.01 inches from the top of the tubesheet do not require plugging.

For Unit 2 only, service-induced flaws identified in the portion of the tube from the top of the tubesheet to 14.01 inches below the top of the tubesheet shall be plugged upon detection.

6. Deleted.

- 7. DEGRADATION ASSESSMENT An assessment of degradation performed prior to an upcoming outage to determine the type and location of flaws to which the tubes may be susceptible and to determine which inspection methods need to be employed and at what locations. The assessment includes appropriate inspection plans, inspection methods and inspection intervals for the applicable degradation mechanisms identified.
- 8. CONDITION MONITORING An evaluation of the "as found" condition of the tubing during a SG inspection outage with respect to the performance criteria for structural integrity and accident induced leakage prior to the plugging of tubes.
- 9. OPERATIONAL ASSESSMENT An evaluation that projects the condition of the tubes from the "as-left" condition exiting a SG inspection outage to the next SG inspection with respect to the performance criteria for structural integrity and accident induced leakage following plugging of tubes.

1.4 PROGRAM DESCRIPTION

This Program verifies the tube integrity of the SGs through periodic eddy current inspections. The Bases for this Program and TS Section were established by NEI TSTF-449 (Reference 7) and NEI 97-06 (Reference 10) and its referenced EPRI Guidelines (References 11 through 16). The SG Program provides a means to detect and plug| degradation of SG tubes in order to maintain the steam generator performance criteria for tube structural integrity, accident induced leakage, and operational leakage as delineated in TS 5.5.9 and NEI 97-06.

1.5 PROGRAM IMPLEMENTATION

A SG Program has been established and implemented to ensure that SG tube integrity is maintained. The SG Program is implemented through Exelon SG Program administrative and surveillance procedures to ensure compliance with the requirements of TS 3.4.19, TS 5.5.9, NEI 97-06 and its associated EPRI Guidelines. The SG Program includes the following provisions:

- 1. Condition monitoring assessments are performed during each SG inspection to evaluate the "as-found" condition of the tubes with respect to the SG performance criteria for structural integrity and accident induced leakage as determined from the inservice inspection results.
- 2. SG integrity is maintained by meeting the performance criteria for tube structural integrity, accident induced leakage and operational leakage. The SG Program procedures implement the performance criteria that are delineated in TS 5.5.9.b and NEI 97-06. Meeting the SG performance criteria provides reasonable assurance of maintaining tube integrity at normal and accident conditions.
- 3. Tubes found by inservice inspection that contain flaws that are equal to or greater than 40% of the nominal tube wall thickness are plugged. For Unit 2 only, service-induced flaws identified in the portion of the tube from the top of the tubesheet to 14.01 inches below the top of the tubesheet are plugged upon detection. For Unit 2 only, service-induced flaws found in the portion of the tube below 14.01 inches from the top of the tubesheet do not require plugging.
- 4. Periodic SG tube inspections are performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube plugging or repair criteria. For Unit 2 only, the portion of the tube below 14.01 inches from the top of tubesheet is excluded. The tube-to-tubesheet weld is not part of the tube. The inspection scope, inspection methods and inspection intervals are determined by a degradation assessment that is performed in accordance with TS 5.5.9.d and NEI 97-06 to ensure that SG integrity is maintained until the next SG inspection.

- 5. Operational primary-to-secondary leakage monitoring is performed in accordance with TS 3.4.13, NEI 97-06 and EPRI Primary to Secondary Leak Guidelines (Reference 12).
- 6. There are no approved tube repair methods for the Units 1 and 2 SGs.

The Engineering Programs Department is the owner of the SG Program. The site Chemistry and Operations Departments are responsible for monitoring and responding to operational primary to secondary leakage. The site Chemistry Department is responsible for implementing the primary water and secondary water chemistry programs as described in References 15 and 16.

1.6 ACCEPTANCE CRITERIA

1. A tube with an imperfection depth greater than or equal to 40% of the nominal tube wall thickness shall be plugged.

For Unit 2 only, service-induced flaws found in the portion of the tube below 14.01 inches from the top of the tubesheet do not require plugging or repair.

For Unit 2 only, service induced flaws identified in the portion of the tube from the top of the tubesheet to 14.01 inches below the top of the tubesheet shall be plugged upon detection.

- 2. Deleted.
- 3. SG tube integrity shall be maintained by meeting the performance criteria for tube structural integrity, accident induced leakage and operational leakage as delineated in TS 5.5.9.b.
- 4. For Unit 1, the maximum equivalent plugging level is 5% per SG.
- 5. For Unit 2, the maximum equivalent plugging level is 10% per SG.

1.7 LCOARS/COMPENSATORY MEASURES

- 1. If a SG performance criterion is exceeded, reports shall be submitted to the NRC as required by 10 CFR 50.72 and 50.73, including a root cause evaluation identifying the performance criterion exceeded and an Operational Assessment establishing the basis for the next operating cycle.
- 2. The Shift Manager shall be notified immediately for any of the conditions identified below. The Shift Manager shall determine OPERABILITY status and implement a LCOAR as applicable. In addition, an Issue Report (IR) may need to be generated to provide proper tracking and resolution of noted problems associated with the implementation of this Program.
 - a. Primary-to-secondary leakage not within limit.
 - b. One or more SG tubes satisfying the tube repair criteria and not plugged in accordance with the SG Program.
 - c. A SG performance criterion is exceeded.
 - d. SG Tube integrity is not maintained.

1.8 REPORTING REQUIREMENTS

- 1. Following each inservice inspection of SG tubes performed in accordance with TS 5.5.9, a report of inspection results shall be submitted to the NRC within 180 days after initial entry into MODE 4 in accordance with TS 5.6.9.
- 2. An inservice summary report shall be submitted to the NRC and IEMA within 90 days of the completion of each refueling outage when SG inspections are performed, as required by ASME Section XI IWA-6000.
- 3. The Steam Generator Surveillance Program effectiveness is monitored by Maintenance Rule Criteria RC-2.

The Engineering Programs Department is responsible for preparing and submitting the above reports.

1.9 CHANGE CONTROL

Changes to this Program, other than editorial changes, shall include a 10CFR50.59 Review and a Station Qualified Review (SQR). The SQR composition shall include Regulatory Assurance Department in all cases. As a part of the SQR, Byron and Braidwood Plant Operations Review Committee (PORC) approval is required as determined by the Regulatory Assurance Manager. Byron and Braidwood shall implement the same change unless the change being implemented at Braidwood has been reviewed and was determined not to be applicable to Byron.

SECONDARY WATER CHEMISTRY PROGRAM BRAIDWOOD

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1.9	CHANGE CONTROL

1.1 PURPOSE

In accordance with Technical Specification (TS) 5.5.10, "Secondary Water Chemistry Program." This Program provides controls for monitoring secondary water chemistry in order to inhibit steam generator tube degradation.

1.2 <u>REFERENCES</u>

- 1. Technical Specification 5.5.10, "Secondary Water Chemistry Program"
- 2. UFSAR Section 5.4.2.1.3, and 10.3.3
- 3. Electric Power Research Institute, PWR Secondary Water Chemistry Guidelines
- 4. Westinghouse Guidelines for Secondary Water Chemistry, February, 1985

1.3 DEFINITIONS AND/OR ACRONYMS

1. SECONDARY SYSTEM CHEMISTRY PARAMETERS - Chemical impurities in the secondary system have the potential to create conditions harmful to steam generator materials. Carefully controlling steam generator chemistry parameters minimizes material degradation.

Parameters that cause rapid corrosion cannot be exceeded for more than brief periods at power. Power reductions or shutdown is required within set times of exceeding limits on these critical parameters.

- 2. Pressurized Water Reactor PWR
- 3. Electric Power Research Institute EPRI
- 4. Institute of Nuclear Power Operations INPO

1.4 PROGRAM DESCRIPTION

The Secondary Chemistry Monitoring Program states chemical parameters which can indicate corrosive conditions and provides concentration limits for each parameter. These secondary chemistry guidelines were derived from Reference 3. Station procedures outline who is responsible for what actions and describes how other documents interact with this Program.

This Program provides controls for monitoring secondary water chemistry to inhibit Steam Generator tube degradation. The Program includes:

- 1. identification of a sampling schedule for critical variables and control points for these variables;
- 2. identification of the procedures used to measure the values of the critical variables;
- 3. identification of process sampling points which shall include monitoring the discharge of the condensate pumps for evidence of condenser inleakage;
- 4. procedures for the recording and management of data;
- 5. procedures defining corrective actions for all out of specification chemistry conditions; and
- 6. procedures identifying the authority responsible for the interpretation of the data and the sequence and timing of corrective actions.

1.5 <u>PROGRAM IMPLEMENTATION</u>

The requirements of the Program apply at all times.

- 1. The sampling schedule for the critical variables and control points for these variables is located in appropriate station procedures. The department responsible for this action is the Chemistry Department.
- 2. A means to measure the values of the critical variables will be located in appropriate station procedures. The Chemistry Department is responsible for revising and implementing these procedures.

- 3. Process sampling points are identified in appropriate station procedures and include the condensate pump discharge for evidence of a condenser leak. The Chemistry Department maintains a sample point book which contains additional sampling points. The Chemistry Department is responsible for this action.
- 4. The recording and management of the data is controlled by appropriate station procedures and is the responsibility of the Chemistry Department.
- 5. The definitions for corrective actions for all out of specification chemistry conditions are in appropriate station procedures and are the responsibility of the Chemistry Department with support from the Operations and Radiation Protection Departments.
- 6. The Chemistry Department shall be responsible for the interpretation of the data and the sequence and timing of corrective actions. This shall be performed with required support from the Operating, Radiation Protection, and System Engineering Departments.

1.6 ACCEPTANCE CRITERIA

This Program is based on Reference 3 and acceptance criteria are incorporated into appropriate station procedures.

1.7 LCOARS/COMPENSATORY MEASURES

The compensatory measures for exceeding secondary water chemistry parameters can be identified in appropriate station procedures. In addition, a Problem Identification Form (PIF) may need to be generated to provide proper tracking and resolution of noted problems associated with the implementation of this Program.

1.8 REPORTING REQUIREMENTS

To assure corporate and station steam generator chemistry objectives are met, an ongoing review of secondary water chemistry will be conducted by the Chemistry Department. The Chemistry Supervisor and/or their designee is responsible for a monthly review of key program parameters, chosen by the Chemistry Supervisor and /or their designee. The Program's effectiveness will be measured against recognized industry standards, such as INPO standards (or other comparable standards).

The Chemistry Department is additionally responsible for reporting and reviewing programmatic failures through an approved station problem identification process.

1.9 CHANGE CONTROL

Changes to this Program, other than editorial changes, shall require a 10CFR50.59 evaluation and an Independent Technical Review (ITR). The ITR composition shall include Regulatory Assurance in all cases. As a part of the ITR, for a change to this Program, concurrence from Byron and Braidwood Plant Operations Review Committee (PORC) approval is required. The concurrence shall be that Byron is implementing the same change or that the change has been reviewed and determined not to be applicable to Byron.

VENTILATION FILTER TESTING PROGRAM BRAIDWOOD

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1.7	LCOARS/COMPENSATORY MEASURES
1.8	REPORTING REQUIREMENTS
1.9	CHANGE CONTROL

1.1 PURPOSE

The purpose of this Program is to provide guidelines for performing surveillance testing of Technical Specification (TS) 5.5.11, "Ventilation Filter Testing Program (VFTP)" HVAC System Filters at Braidwood Station.

1.2 REFERENCES

- 1. Technical Specification Section 5.5.11, "Ventilation Filter Testing Program (VFTP)"
- USNRC Regulatory Guide 1.52, Rev. 2, March 1978
- 3. ANSI N510 1980
- 4. ASTM D 3803-1989, "Standard Test Method for Nuclear Grade Activated Carbon"
- UFSAR Appendix A

1.3 DEFINITIONS AND/OR ACRONYMS

- Ventilation Filter Testing Program VFTP
- 2. High Efficiency Particulate Air HEPA

1.4 PROGRAM DESCRIPTION

This Program implements the following required testing of Engineered Safety Feature (ESF) ventilation filter systems at the frequencies specified in accordance with References 2 and 3.

- 1. Demonstrate for each of the ESF filter systems that an in-place test of the High Efficiency Particulate Air (HEPA) filters shows a penetration when tested in accordance with References 2 and 3 at the system flow rate, specified in Table 1, Part 1.
- 2. Demonstrate for each of the ESF filter systems that an in place test of the charcoal absorber shows a bypass leakage within limits when tested in accordance with References 2 and 3 at the system flow rated specified in Table 1. Part 2.

- 3. Demonstrate for each of the ESF filter systems that a laboratory test of a sample of the charcoal absorber, when obtained as described in Reference 2, shows the methyl iodide penetration less than the value specified in Table 1, Part 3, when tested in accordance with References 2, 3 and 4 at a temperature of 30°C and Relative Humidity (RH) specified in Table 1, Part 3.
- 4. Demonstrate for each of the ESF filter systems that the pressure drop across the combined HEPA filters and the charcoal adsorbers is < 6 inches of water gauge when tested in accordance with References 2 and 3 at the system flow rate, specified in Table 1, Part 4.
- 5. Demonstrate for each of the ESF filter systems that a bypass leakage test of the 1) combined HEPA filters and damper or 2) combined charcoal filter and damper leakage shows a total bypass leakage within acceptable limits at the system flow rate specified in Table 1, Part 5.
- 6. Demonstrate that the heaters for each of the ESF filter systems dissipate the value specified in Table 1, Part 6, when tested in accordance with References 3 and 5.

1.5 PROGRAM IMPLEMENTATION

Technical Section Filter Testing, Inspection and Repair

- 1. Control Room Ventilation (VC) System:
 - a. At least once per 18 months (+ 25% tolerance) or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housing, or (2) following painting, fire or chemical release in any ventilation zone communicating with the Emergency Makeup System filter plenum shall meet the following requirements:
 - 1. Verify that each HEPA and charcoal bank satisfies the inplace penetration testing acceptance criteria of less than 0.05% and less than 1.0%, respectively; and that the system flow rate is ≥ 5400 cfm and ≤ 6600 cfm for the Emergency Makeup System using test procedure guidance in accordance with References 2 and 3;

- 2. Verify, within 31 days (+ 25% tolerance) after removal, that a laboratory analysis of a representative carbon sample from the Emergency Makeup System obtained in accordance with Reference 2 meets the laboratory testing criteria for a methyl iodide penetration of less than 2.0% when tested according to Reference 4 at a temperature of 30 °C and a RH of 70%; and
- 3. Verify a system flow rate of \geq 5400 cfm and \leq 6600cfm for the Emergency Makeup System and \geq 44,550 cfm and \leq 54,450 cfm for the Recirculation System when tested in accordance with Reference 3.
- b. After every 720 hours (+ 25% tolerance) of Emergency Makeup System operation, verify, within 31 days (+ 25% tolerance) after removal, that a laboratory analysis of a representative carbon sample from the Emergency Makeup System obtained in accordance with Reference 2, meets the laboratory testing criteria for a methyl iodide penetration of less than 2.0% when tested according to Reference 4 at a temperature of 30°C and a RH of 70%.
- c. At least once per 18 months (+ 25% tolerance) by:
 - 1. verifying the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6.0 inches Water Gauge while operating the Emergency Makeup System at a flow rate of \geq 5400 cfm and \leq 6600 cfm when tested in accordance with References 2 and 3.
 - verifying that the heaters dissipate ≥ 24.5 kW and ≤ 29.9 kW when tested in accordance with Reference 3 and the exceptions noted in Reference 5.

- d. After each complete or partial replacement of a HEPA filter bank in the Emergency Makeup System, verify that the affected HEPA filter bank satisfies the inplace penetration testing acceptance criteria of less than 0.05% in accordance with Reference 3 while operating the Emergency Makeup System at a flow rate of \geq 5400 cfm and \leq 6600 cfm.
- e. After each complete or partial replacement of a charcoal adsorber bank in the Emergency Makeup System, verify that the affected charcoal adsorber bank satisfies the inplace penetration testing acceptance criteria of less than 1% in accordance with Reference 3 while operating the system at a flow rate of ≥ 5400 cfm and ≤ 6600 cfm.
- f. At least once per 18 months (+ 25% tolerance) or (1) after any structural maintenance on the charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the recirculation charcoal adsorber by:

- 1. verifying that the recirculation charcoal adsorber plenum satisfies the inplace penetration testing acceptance criteria of less than 2% total bypass, using the test procedure guidance in accordance with References 2 and 3, while the system flow rate is \geq 44,550 cfm and \leq 54,450 cfm for the recirculation charcoal adsorber:
- 2. verifying, within 31 days (+ 25% tolerance) after removal, that a laboratory analysis of a representative carbon sample from the recirculation charcoal adsorber obtained in accordance with Reference 2 meets the laboratory testing criteria for a methyl iodide penetration of less than 4% when tested according to Reference 4 at a temperature of 30 °C and a RH of 70%; and
- 3. verifying a system flow rate of \geq 44,550 cfm and \leq 54,450 cfm for the Recirculation Charcoal Adsorber when tested in accordance with Reference 3.
- g. After each complete or partial replacement of a charcoal adsorber bank in the Recirculation Charcoal Absorber System by verifying that the charcoal adsorber bank satisfies the inplace penetration testing acceptance criteria of less than 0.1% in accordance with Reference 3 while operating at a system flow rate of \geq 44,550 cfm and \leq 54,450 cfm.
- h. After every 720 hours (+ 25% tolerance) of Recirculation Charcoal Adsorber System operation by verifying, within 31 days (+ 25% tolerance) after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Reference 2, meets the laboratory testing criteria for a methyl iodide penetration of less than 4% when tested according to Reference 4 at a temperature of 30°C and a RH of 70%.

- Non-Accessible Area Exhaust Filter Plenum Ventilation System:
 - a. At least once per 18 months (+ 25% tolerance) or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housing, or (2) following painting, fire or chemical release in any ventilation zone communicating with the exhaust filter plenum by:
 - 1. verifying that each HEPA and charcoal bank satisfies the inplace penetration and bypass leakage testing acceptance criteria of less than 1%, using the test procedure guidance in accordance with References 2 and 3, while the flow rate is \geq 60,210 cfm and \leq 73,590 cfm for the train;
 - 2. verifying, within 31 days (+ 25% tolerance) after removal, that a laboratory analysis of a representative carbon sample from each bank of adsorbers of the train obtained in accordance with Reference 2 meets the laboratory testing criteria for a methyl iodide penetration of less than 4.5% (and administratively controlled to less than 3% to accommodate total bypass leakage margin) when tested according to Reference 4 at a temperature of 30 °C and a RH of 70%; and
 - 3. verifying a system flow rate of \geq 60,210 cfm and \leq 73,590 cfm through the train through the exhaust filter plenum when tested in accordance with Reference 3.
 - 4. verifying that with 2 of 3 trains operating at a flow rate of ≥ 60,210 cfm and ≤ 73,590 cfm for each train and exhausting through the HEPA filters and charcoal adsorbers, with 2 main VA supply and 2 main VA exhaust fans operating, the total charcoal bypass flow of the system including damper bypass leakage at an additional 0.5 inches water gauge differential pressure above actual differential pressure for all three trains (two on-line and one in standby) is less than or equal to 4%.

- 5. verifying that with 2 of 3 trains operating at a flow rate of ≥ 60,210 cfm and ≤ 73,590 cfm for each train and exhausting through the HEPA filters and charcoal adsorbers, with 2 main VA supply and 2 main VA exhaust fans operating, the total HEPA bypass flow of the system including damper bypass leakage at an additional 0.5 inches wter gauge differential pressure above actual differential pressure for all three trains (two on-line and one in standby) is less than or equal to 1%.
- 6. verifying, with a system flow of \geq 60,210 cfm and \leq 73,590 cfm through the train and exhaust filter plenum, that the flow rate in each filter bank is \geq 20,070 cfm and \leq 24,530 cfm.
- b. After every 720 hours (+25% tolerance) of charcoal adsorber operation by verifying, within 31 days (+ 25% tolerance) after removal, that a laboratory analysis of a representative carbon sample obtained from each bank of adsorbers of the train in accordance with Reference 2, meets the laboratory testing criteria for a methyl iodide penetration of less than an average of 4.5% (and administratively controlled to less than 3% to accommodate total bypass leakage margin) when tested according to Reference 4 at a temperature of 30°C and a RH 70%.
- c. At least once per 18 months (\pm 25% tolerance) by verifying for each filter bank of the train that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6.0 inches Water Gauge while operating the exhaust filter plenum at a flow rate of \pm 60,210 cfm and \pm 73,590 cfm when tested in accordance with References 2 and 3.
- d. After each complete or partial replacement of a HEPA filter bank by verifying that the exhaust filter plenum satisfies the inplace penetration testing acceptance criteria of less than 1% in accordance with Reference 3 while operating at a flow rate of ≥ 60,210 cfm and ≤ 73,590 cfm through the train.

- e. After each complete or partial replacement of a charcoal adsorber bank by verifying that the exhaust filter plenum satisfies the inplace penetration testing acceptance criteria of less than 1% in accordance with Reference 3 while operating at a system flow rate of \geq 60,210 cfm and \leq 73,590 cfm through the train.
- 3. Fuel Handling Building Exhaust Filter Plenums:
 - a. At least once per 18 months (+ 25% tolerance) or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housing, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:
 - verifying that the Fuel Handling Building Exhaust Filter Plenum satisfies the inplace penetration testing acceptance criteria of less than 1% when using the test procedure guidance in accordance with References 2 and 3 while the system flow rate is ≥ 18,900 cfm and ≤ 23,100 cfm;
 - 2. verifying, within 31 days (+ 25% tolerance) after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Reference 2 meets the laboratory testing criteria for a methyl iodide penetration of less than 10% when tested according to Reference 4 at a temperature of 30 °C and a RH of 95%;
 - 3. verifying a flow rate of ≥ 18,900 cfm and ≤ 23,100 cfm through the Fuel Handling Building Exhaust Filter Plenum during operation when tested in accordance with Reference 3; and

- 4. verifying that with the system operating at a flow rate of ≥ 18,900 cfm and ≤ 23,100 cfm and exhausting through the HEPA filters and charcoal adsorbers, with 2 main VA supply and 2 main VA exhaust fans operating, the total HEPA bypass flow of the system including damper bypass leakage at an additional 0.5 inches water gauge differential pressure above actual differential pressure is less than or equal to 1% and the total charcoal bypass flow of the system including damper bypass leakage is less than or equal to 1%.
- b. After every 720 hours (+25% tolerance) of charcoal adsorber operation by verifying, within 31 days (+ 25% tolerance) after removal, that a laboratory analysis of a representative carbon sample obtained in accordance with Reference 2, meets the laboratory testing criteria for a methyl iodide penetration of less than 10% when tested according to Reference 4 at a temperature of 30°C and a RH of 95%.
- c. At least once per 18 months (+25% tolerance) by verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6.0 inches Water Gauge while operating the exhaust filter plenum at a flow rate of \geq 18,900 cfm and \leq 23,100 cfm when tested in accordance with References 2 and 3.
- d. After each complete or partial replacement of a HEPA filter bank by verifying that the Fuel Handling Building Exhaust Filter Plenum satisfies the inplace penetration testing acceptance criteria of less than 1% in accordance with Reference 3 while operating at a system flow rate of \geq 18,900 cfm and \leq 23,100 cfm; and
- e. After each complete or partial replacement of a charcoal adsorber bank by verifying that the Fuel Handling Building Exhaust Filter Plenum satisfies the inplace penetration testing acceptance criteria of less than 1% in accordance with Reference 3 while operating at a system flow rate of ≥ 18,900 cfm and ≤ 23,100 cfm.

1.6 <u>ACCEPTANCE CRITERIA</u>

Acceptance criteria is listed in Table 1.

1.7 LCOARS/COMPENSATORY MEASURES

In the event any of the acceptance criteria is not met, the Shift Manager will immediately be notified. The Shift Manger shall determine OPERABILITY status and implement a LCOAR as applicable. In addition, an Issue Report may be generated to provide proper tracking and resolution of noted problems associated with the implementation of this Program.

1.8 <u>REPORTING REQUIREMENTS</u>

Not applicable.

1.9 CHANGE_CONTROL

Changes to this Program, other than editorial changes, shall require a 10 CFR 50.59 Review and a Station Qualified Review (SQR). The SQR composition shall include Regulatory Assurance Department in all cases. As a part of the SQR, Byron and Braidwood Plant Operations Review Committee (PORC) approval is required as determined by the Regulatory Assurance Manager. Byron and Braidwood shall implement the same change unless the change being implemented at Braidwood has been reviewed and was determined not to be applicable to Byron.

TABLE 1 VENTILATION FILTER TESTING PROGRAM (VFTP)

Part 1

1010 1		
ESF Ventilation System	Flow Rate	<u>Penetration</u>
Control Room Ventilation (VC) Filtration System (makeup)	≥ 5400 cfm and ≤ 6600 cfm	<0.05%
Nonaccessable Area Exhaust Filter Plenum Ventilation System (after structural maintenance of the HEPA filter housings)	≥ 60,210 cfm and ≤ 73,590 cfm per train, and ≥ 20,070 cfm and ≤ 24,530 cfm per bank	< 1%
Nonaccessible Area Exhaust Filter Plenum Ventilation System (for reasons other than structural maintenance of the EPA filter housings)	≥ 60,210 cfm and ≤ 73,590 cfm per train	< 1%
Fuel Handling Building Exhaust Filter Plenum (FHB) Ventilation System	≥ 18,900 cfm and ≤ 23,100 cfm	< 1%

Part 2		
ESF Ventilation System	Flow Rate	<u>Bypass</u>
VC Filtration System (makeup)	≥ 5400 cfm and ≤ 6600 cfm	< 1%
VC Filtration System (recirculation, charcoal bed after complete or partial replacement)	≥ 44,550 cfm and ≤ 54,450 cfm	< 0.1%
Nonaccessible Area Exhaust Filter Plenum Ventilation System (after structural maintenance of the charcoal adsorber housings)	\geq 60,210 cfm and \leq 73,590 cfm per train, and \geq 20,070 cfm and \leq 24,530 cfm per bank	< 1%
Nonaccessible Area Exhaust Filter Plenum Ventilation System (for reasons other than structural maintenance of the charcoal adsorber housings)	≥ 60,210 cfm and ≤ 73,590 cfm per train	< 1%
FHB Ventilation System	≥ 18,900 cfm and ≤ 23,100 cfm per train	< 1%

Pa	rt	3

ESF Ventilation System	<u>Penetration</u>	RH
VC Filtration System (makeup)	2.0%	70%
VC Filtration System (recirculation)	4%	70%
Nonaccessible Area Exhaust Filter Plenum Ventilation System	4.5%	70%
FHB Ventilation System	10%	95%

Part 4

EFS Ventilation System	Flow Rate
VC Filtration System (makeup)	≥ 5400 cfm and ≤ 6600 cfm
Nonaccessible Area Exhaust Filter Plenum Ventilation System	\geq 60,210 cfm and \leq 73,590 cfm per train
FHB Ventilation System	≥ 18,900 cfm and ≤ 23,100 cfm

Part 5

ESF Ventilation System	Flow Rate	<u>Bypass</u>
Nonaccessible Area	\geq 60,210 cfm and	$\leq 1\%$ (HEPA)
Exhaust Filter Plenum Ventilation System	≤ 73,590 cfm per on-line train	≤ 4% (Charcoal)
FHB Ventilation System	≥ 18,900 cfm and ≤ 23,100 cfm	≤ 1%
VC Filteration System (recirculation for reasons other than complete or partial charcoal bed replacement)	≥ 44,550 cfm and ≤ 54,450	< 2%

Part 6

ESF Ventilation System	<u>Wattage</u>
VC Filtration System	\geq 24.5 kW and \leq 29.9 kW

EXPLOSIVE GAS AND STORAGE TANK RADIOACTIVITY MONITORING PROGRAM BRAIDWOOD

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1.6	ACCEPTANCE CRITERIA
1.7	LCOARS/COMPENSATORY MEASURES
1.8	REPORTING REQUIREMENTS
1.9	CHANGE CONTROL

1.1. PURPOSE

In accordance with Technical Specification (TS) Specification 5.5.12, "Explosive Gas and Storage Tank Radioactive Monitoring Program". This Program provides controls for:

- 1. potentially explosive gas mixtures contained in the Waste Gas System;
- 2. the quantity of radioactivity contained in gas decay tanks; and
- 3. the quantity of radioactivity contained in unprotected outdoor liquid radwaste storage tanks.

The requirements of this Program dictate the contents of the implementing procedures.

1.2 REFERENCES

- 1. TS Specification 5.5.12, "Explosive Gas and Storage Tank Radioactivity Monitoring Program"
- 2. UFSAR Section 11.3.2.6
- 3. ODCM
- 4. Standard Review Plan 11.3, Branch Technical Position (BTP) ETSB 11-5, "Postulated Radioactive Release due to Waste Gas System Leak or Failure," in NUREG-0800, July 1981
- 5. 10CFR20, Appendix B, Table 2, Column 2
- 6. General Design Criterion 60 of Appendix A to 10CFR50

1.3 DEFINITIONS AND/OR ACRONYMS

A WASTE GAS HOLDUP SYSTEM - Any system designed and installed to reduce radioactive gaseous effluents by collecting Reactor Coolant System off-gases from the Reactor Coolant System and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment. PRIMARY COOLANT DEGASSING OPERATION - When preparing the plant for MODE 5 prior to MODE 6, the Reactor Coolant is degassed to reduce the hydrogen concentrations. At the start of the degassing operation, the Volume Control Tank (VCT) gas space contains hydrogen and traces of fission gases. The operation involves opening the VCT vent, raising VCT water level to force gasses out of the tank, and closing the VCT vent.

MEMBER(S) OF THE PUBLIC - Include all persons who are not occupationally associated with the plant. This category does not include employees of the licensee, its contractors or vendors and persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational, or other purposes not associated with the plant.

The SITE BOUNDARY - Be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by the licensee.

IMMEDIATELY - That the Required Actions should be pursued without delay and in a controlled manner.

1.4 PROGRAM DESCRIPTION

This Program ensures that the concentration of potentially explosive gas mixtures contained in the WASTE GAS HOLDUP SYSTEM is maintained below the flammability limits for hydrogen and oxygen. Sample instruments with alarms are provided to alert operators to take compensatory measures to prevent the hydrogen and oxygen concentrations from reaching flammability limits. Maintaining the concentration of hydrogen and oxygen below their flammability limits provides assurance that the releases of radioactive materials will be controlled in conformance with the requirements of Reference 6.

Restricting the quantity of radioactivity contained in each gas decay tank provides assurance that in the event of an uncontrolled release of the tank's contents, the resulting whole body exposure to a MEMBER OF THE PUBLIC at the nearest SITE BOUNDARY will not exceed 0.5 rem. This is consistent with Reference 4.

The quantity of radioactivity contained in all outdoor liquid radwaste tanks that are not surrounded by liners, dikes, or walls, capable of holding the tank's contents and that do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system is an amount that would result in concentrations less than the limits of Reference 5, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tank's contents.

The Radiation Protection Department shall be the Program owner with required support from the Operating, Chemistry, and System Engineering Departments.

1.5 PROGRAM IMPLEMENTATION

The requirements of this Program apply at all times.

- 1. The concentration of hydrogen and oxygen in the WASTE GAS HOLDUP SYSTEM shall be determined to be within the acceptance criteria by continuously monitoring the waste gases in the WASTE GAS HOLDUP SYSTEM with the hydrogen and oxygen monitors required by TRM LCO 3.3.e.
- 2. The quantity of radioactivity contained in each gas decay tank shall be determined, in accordance with the guidance provided in Reference 4, to be within the acceptance criteria at least once per 7 days when radioactive materials are being added to the tank, and at least once per 24 hours during PRIMARY COOLANT DEGASSING OPERATION.
- 3. The quantity of radioactive material contained in the Primary Water Storage Tank and any Outside Temporary Tanks shall be determined to be within the acceptance criteria by analyzing a representative sample of the tank's contents at least once per 7 days when radioactive materials are being added to the tank.

If the supply and discharge piping to the Primary Water Storage Tanks are crosstied with flow for a sufficient duration, one sample of the Primary Water Makeup System may be used to represent the contents of each tank.

1.6 ACCEPTANCE CRITERIA

1. Explosive Gas Mixtures

The concentration of oxygen in the WASTE GAS HOLDUP SYSTEM shall be $\leq 2\%$ by volume whenever the hydrogen concentration is > 4% by volume.

2. Radioactivity Contained in Gas Decay Tanks

The quantity of radioactivity contained in each gas decay tank shall be limited to \leq 5 E+04 Curies of noble gases (considered as Xe-133 equivalent).

3. Radioactivity Contained in Unprotected Outdoor Liquid Radwaste Storage Tanks.

The quantity of radioactive material, excluding tritium and dissolved or entrained noble gases, shall be limited to the following:

a. Primary Water Storage Tank \leq 2000 Curies when sampling OA and OB Primary Water Storage Tanks individually

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Primary Water Storage Tank ≤ 1000 Curies when obtaining one sample representing both tanks with OA and OB Primary Water Storage Tanks crosstied

b. Outside Temporary Tank ≤ 10 Curies

1.7 LCOARS/COMPENSATORY MEASURES

- 1. Explosive Gas Mixtures
 - a. With the concentration of oxygen in the WASTE GAS HOLDUP SYSTEM > 2% by volume but $\le 4\%$ by volume, when hydrogen is > 4% by volume, restore the oxygen concentration to $\le 2\%$ within 48 hours.

b. With the concentration of oxygen in the WASTE GAS HOLDUP SYSTEM > 4% by volume and the hydrogen concentration > 4% by volume, IMMEDIATELY suspend all additions of waste gases to the system and reduce the concentration of oxygen to \leq 4% by volume, then restore the oxygen concentration to \leq 2% within the following 48 hours.

The department responsible for the above actions is the Operating Department.

2. Radioactivity Contained in Gas Decay Tanks

With the quantity of radioactive material in any gas decay tank exceeding the acceptance criteria:

- a. IMMEDIATELY suspend all additions of radioactive material to the tank, and within 48 hours, reduce the tank contents to within the limit; and
- b. describe the events leading to this condition in the next Radioactive Effluent Release Report.

The department responsible for action a is the Operating Department, action b is the responsibility of the Radiation Protection Department.

3. Radioactivity Contained in Unprotected Outdoor Liquid Radwaste Storage Tanks

With the quantity of radioactive material in the Primary Water Storage Tank or any Outside Temporary Tank exceeding the acceptance criteria:

- a. IMMEDIATELY suspend all additions of radioactive material to the tank;
- b. within 48 hours reduce the tank contents to within the acceptance criteria; and
- c. describe the events leading to this condition in the next Radioactive Effluent Release Report

The Operations Department is responsible for actions a and b, and the Radiation Protection Department is responsible for action c.

The Shift Manager shall determine OPERABILITY status and implement a LCOAR as applicable. A Problem Identification Form (PIF) may need to be generated to provide proper tracking and resolution of noted problems associated with the implementation of this Program.

1.8 REPORTING REQUIREMENTS

This Program shall be reviewed every two years for technical accuracy and revision. The review shall be done by the Radiation Protection Department with input from the Operating, Chemistry, and System Engineering Departments.

Program failures shall be reported through an approved station problem identification process. The Operations Department will be responsible for ensuring that Program failures have been reported.

1.9 <u>CHANGE CONTROL</u>

Changes to this Program, other than editorial changes, shall include a 10CFR50.59 evaluation and an Independent Technical Review (ITR). The ITR composition shall include Regulatory Assurance Department in all cases. As a part of the ITR, for a change to this Program, concurrence from Byron and Braidwood Plant Operations Review Committee (PORC) approval is required. The concurrence shall be that Byron is implementing the same change or that the change has been reviewed and determined not to be applicable to Byron.

DIESEL FUEL OIL TESTING PROGRAM BRAIDWOOD

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1.8	REPORTING REQUIREMENTS
1.9	CHANGE CONTROL

1.1 PURPOSE

The purpose of this Program is to provide guidance for implementation of Diesel Fuel Oil Testing at the Braidwood Station as required by Technical Specification (TS) 5.5.13. This Program, through approved Exelon Nuclear, Braidwood Station, or Vendor procedures, ensures that delivered, new and stored diesel fuel oil meet the appropriate standards.

1.2 <u>REFERENCES</u>

1. Technical Specification 5.5.13, "Diesel Fuel Oil Testing Program"

2. ASTM Standards

- a. D5452-98, "Particulate Contamination in Aviation Fuels by Laboratory Filtration."
- b. D1552-95, "Standard Test Method for Sulfur in Petroleum Products (High Temperature Method)"
- c. D975-98b, "Standard Specifications for Diesel Fuel Oils"
- d. D2622-98, "Standard Test Method for Sulfur in Petroleum Products by Wavelength Dispersive X-Ray Fluorescent Spectrometry"
- Fluorescent Spectrometry"
 e. D4176-93, "Standard Test Method for Free Water and Particulate Contamination in Distillate Fuels (Visual Inspection Procedures)"
- f. D4057-95, "Standard Practice for Manual Sampling of Petroleum and Petroleum Products"
- g. D1298-99, "Standard Practice for Density, Relative density (Specific Gravity), or API Gravity of Crude Petroleum and Liquid Petroleum Products by Hydrometer Method"
- h. D4294-98, "Standard Test Method for Sulfur in Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectroscopy"
- i. D2709-96e, "Test Method for Water and Sediment in Distillate Fuels by Centrifuge"
- j. D1500-98, "Standard Test Method for ASTM Color of Petroleum Products (ASTM Color Scale)"

1.3 DEFINITIONS AND/OR ACRONYMS

- DELIVERED DIESEL FUEL Any diesel fuel being delivered to 1. Braidwood Station which is intended to be used by INSTALLED PLANT EQUIPMENT. Fuel is typically delivered by truck and is either blended at approximately 25% #1 grade and 75% #2 grade, or purchased such that the resultant fuel has an approximate 25% #1 to 75% #2 ratio (i.e. one truck load #1 to three truck loads #2). This blend can be used yeararound, but is intended to prevent winter gelling concerns. Braidwood Station may also specify straight #2 fuel if desired, with optional anti-gel additives utilized for winter considerations. Delivered diesel fuel oil receives a cursory analysis of properties to give confidence that the truck indeed contains diesel fuel oil prior to adding it to any OUTDOOR BULK DIESEL FUEL OIL TANK. If fuel is being delivered using the one truck load #1 to three truck loads #2 method to achieve the blend, it is recognized that the straight #1 fuel parameters may not meet the blend's specification. In this case, the fuel is still accepted since it is known that it will eventually be blended with #2 and the resultant further analyzed before use as described in the definition of "UNCERTIFIED" DIESEL FUEL OIL.
- 2. "UNCERTIFIED" DIESEL FUEL OIL Any diesel fuel oil that has not been tested and found to meet the applicable acceptance criteria for grade #2 diesel fuel oil and is to be added, or already is in, the INSTALLED PLANT EQUIPMENT'S TANKS or the OUTDOOR BULK DIESEL FUEL OIL TANKS. Fuel in the INSTALLED PLANT EQUIPMENT'S TANKS or the OUTDOOR BULK DIESEL OIL TANKS can become "UNCERTIFIED" when samples are not found to meet fuel specification (following analysis of an optional confirmatory sample) or by adding DELIVERED or "UNCERTIFIED" FUEL to the tanks. In the event fuel is "UNCERTIFIED", actions are taken to either bring the fuel back into specifications and/or prevent the fuel from being used until it is deemed "CERTIFIED".
- 3. "CERTIFIED" DIESEL FUEL OIL Diesel fuel oil in any station diesel fuel oil tank which has previously been sampled, analyzed, and found to meet the applicable acceptance criteria for grade #2 diesel fuel oil. This fuel can be stored in either the OUTDOOR BULK DIESEL FUEL OIL TANKS or tanks associated with the INSTALLED PLANT EQUIPMENT. This fuel is periodically sampled and analyzed. See Attachment A for test and test frequency.

4. NEW FUEL OIL - Diesel fuel oil that has been sampled and tested in accordance with the requirements of TS 5.5.13 for NEW FUEL OIL. TS 5.5.13 requires specific tests of fuel oil prior to addition to storage tanks, e.g., 1) an API gravity or an absolute specific gravity, 2) a flash point and kinematic viscosity, and 3) a clear and bright appearance with proper color or a water and sediment content. Additional tests are required to verify other properties of NEW FUEL OIL within 30 days following sampling and addition to storage tanks.

For the Emergency Diesel Generators (EDGs), the OUTDOOR BULK DIESEL FUEL OIL TANKS (one 50,000 gal. and one 125,000 gal.) are normally the source of "NEW" FUEL OIL

5. STORED FUEL OIL - Diesel fuel oil that has been sampled and tested in accordance with the requirements of TS 5.5.13 for STORED FUEL OIL. Fuel oil degradation during long term storage shows up as an increase in particulate, due mostly to oxidation. Consequently, TS 5.5.13 requires STORED FUEL OIL to be tested for total particulate concentration every 31 days.

For the EDGs, the inside storage tanks (each Unit 1 EDG is provided with two 25,000 gal. inside storage tanks and each Unit 2 EDG is provided with one 50,000 gal. inside storage tank) are the source of the required "STORED" FUEL OIL.

- 6. INSTALLED PLANT EQUIPMENT EDGs, Diesel-driven fire pump, Security diesel generator, Diesel-driven Auxiliary Feedwater pump, Auxiliary boilers (note: Auxiliary boilers burn "CERTIFIED" or "UNCERTIFIED" fuel directly from the OUTDOOR BULK DIESEL FUEL OIL TANKS).
- 7. OUTDOOR BULK DIESEL FUEL OIL TANKS Typically called 125K and 50K tanks (OD003T and OD012T respectively). These tanks receive the delivered fuel and store it "UNCERTIFIED" until being "CERTIFIED" through analysis. Once "CERTIFIED" the fuel stored in these tanks is normally used to fill the tanks of the INSTALLED PLANT EQUIPMENT.

1.4 PROGRAM DESCRIPTION

The Diesel Fuel Oil Testing Program provides guidance for testing DELIVERED, NEW, and STORED DIESEL FUEL OIL. This Program includes sampling and testing requirements as outlined in Attachment A which also may be contained in appropriate procedures, as well as acceptance criteria in accordance with the applicable standards. This Program also describes preventative maintenance activities that are performed to ensure good fuel quality and tank condition for certain INSTALLED PLANT EQUIPMENT TANKS.

1.5 <u>PROGRAM IMPLEMENTATION</u>

This Diesel Fuel Oil Testing Program implements required sampling and analysis of DELIVERED, NEW, and STORED DIESEL FUEL OIL. The Program includes sampling and testing requirements as outlined in Attachment A which also may be contained in appropriate procedures, as well as acceptance criteria, in accordance with applicable standards. This Program also describes preventative maintenance activities that are performed to ensure good fuel quality and tank condition for certain INSTALLED PLANT EQUIPMENT'S TANKS. This Program establishes the following:

- 1. Other properties of NEW FUEL OIL are within limits within 30 days following sampling in accordance with ASTM D4057-95 and addition to storage tanks;
- 2. Total particulate concentration of the fuel oil is \leq 10 mg/l when tested every 31 days in accordance with ASTM D5452-98.
- 3. Acceptability (certification) of "UNCERTIFIED" fuel oil and continued certification on a periodic basis in the fuel oil storage tanks by determining that the fuel oil:
 - a. meets ASTM D975-98b specifications;
 - b. meets ASTM D5452-98 specification for particulate contamination;
 - c. meets Illinois EPA sulfur requirements and may be tested in accordance with ASTM D1552-95, ASTM D2622-98, or ASTM D4294-98;
 - d. a flash point and kinematic viscosity is within limits:

- e. API specific gravity or an absolute specific gravity within limits when tested in accoradance with ASTM D1298-99;
- f. water and sediment when tested in accordance with ASTM D2709-96e is within limits; and
- g. a clear and bright appearance with when tested in accordance with ASTM D4176-93, and proper color when tested in accordance with ASTM D1500-98.

Actual testing for each individual tank may vary. The minimum testing schedule is shown in Attachment A. Actual fuel analysis performed is determined within specific Exelon Nuclear, Braidwood Station, or approved Vendor procedures.

- 4. 10 year OUTDOOR BULK DIESEL FUEL OIL TANK (ODOO3T 125K gallon tank and ODO12T 50K gallon tank) cleaning using a Sodium hypochlorite (household bleach) solution or evaluated equivalent; and
- 5. 10 year EDG tank cleaning using a Sodium Hypochlorite (household bleach) solution or evaluated equivalent (Unit 1 has four 25,000 gallon (1D001TA/B/C/D) and Unit 2 has two 50,000 gallon (2D001TA/B) tanks); and
- 6. Periodic check for and removal of accumulated water from the EDG day tanks.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program frequencies.

The Braidwood Operating Department, Chemistry Departments, and Vendors are responsible for the implementation, performance, completion, and reporting of this Program.

1.6 ACCEPTANCE CRITERIA

Acceptance criteria for the fuel used in the INSTALLED PLANT EQUIPMENT at Braidwood is specified in the applicable Exelon Nuclear, Braidwood Station, and Vendor procedures implemented by this Program.

1.7 LCOARS/COMPENSATORY MEASURES

In the event the diesel fuel oil does not meet the acceptance criteria, the Shift Manager or designee shall be immediately notified. The Shift Manager or designee shall determine OPERABILITY status and implement a LCOAR(s) as applicable. Typically, fuel stored in the 125K and 50K OUTDOOR BULK DIESEL FUEL OIL TANKS which does not meet acceptance criteria is declared "UNCERTIFIED" since there is not any LOCAR(s) associated with these tanks. Actions are taken to prevent "UNCERTIFIED" fuel from being used. A confirmatory sample should be analyzed in the event a sample is found to not meet the acceptance criteria. In addition, a Condition Report (CR) may need to be generated to provide proper tracking and resolution of noted problems associated with the implementation of this Program.

1.8 REPORTING REQUIREMENTS

Analysis results are reported to Braidwood by Vendor.

1.9 CHANGE CONTROL

Changes to this Program, other than editorial changes, shall include a 10 CFR 50.59 Review and a Station Qualified Review (SQR). The SQR composition shall include Regulatory Assurance Department in all cases. As a part of the SQR, concurrence from Byron and Braidwood Plant Operations Review Committee (PORC) approval is required as determined by the Regulatory Assurance Manager. Byron and Braidwood shall implement the same change unless the change has been reviewed and determined not to be applicable to Braidwood.

ATTACHMENT A Diesel Fuel Oil Testing Matrix

	Outdoor Bulk Diesel Fuel Oil Tanks: ODOO3T (125K gal.) ODOO12T (50K gal.)	EDG Tanks: 1D001TA/B/C/D (25K gal.) 2D001TA/B (50K gal.)	EDG Tanks: 1D002TA/B (500 gal.) 2D002TA/B (500 gal.)	_B AF Pump Diesel Day Tanks: 1D010T (500 gal.) 2D010T (500 gal.)	Diesel-Driven Fire Pump Diesel Fuel Oil Tank: ODOO5T (650 gal.)	Security Diesel Generator Day Tank: ODOO6T (500 gal.)
Frequency	Monthly	Monthly	Monthly	Monthly ⁽⁵⁾	Monthly ⁽⁵⁾	Monthly
Parameter:						
Flash Point	XX ⁽²⁾					
Cloud Point	ХХ(3)					
Water & Sediment	XX(1)(2)	Χ	Х	Х	χ	Χ
Ramsbottom Carbon Residue	ХХ(3)					
Ash	ХХ(3)					
Kinematic Viscosity	XX ⁽²⁾	Х	Х	Х	Х	Х
Copper Strip Corrosion	XX ₍₃₎					
Cetane Index	XX(3)					
Sulfur	XX(3)					
API Gravity	XX ⁽²⁾	Χ	Χ	Χ	Χ	Χ
Distillation Temperature	XX ⁽³⁾					
Bacteria	χ					
Clear & Bright	XX(1)(2)	Χ	χ	Χ	χ	Χ
Color	XX(1)(2)	Χ	Х	Х	χ	Χ
Heat Value	χ					
Total Particulate Contamination	XX ⁽⁴⁾	XX	Х	Х	Х	Х
Removal of accumulated water	XX	XX	XX			

 $\mathsf{XX} = \mathsf{Technical}$ Specification required testing performed $\mathsf{X} = \mathsf{Testing}$ performed

TRM Diesel Fuel Oil Testing Program Appendix M

NOTES:

- (1) (2) (3) (4)
- Water & Sediment <u>OR</u> Clear & Bright with Color is required.

 Technical Specifications require verifying within limits within 30 days prior to adding new fuel oil to storage tanks.

 Technical Specifications require verifying within 30 days following sampling and addition to storage tanks.

 Required since the Outdoor Bulk Diesel Fuel Oil Tanks are considered the source of stored fuel for the <u>B</u> AF Pump Diesel Day Tanks.

 Testing performed on a monthly basis, however, results are only required to be verified on a quarterly basis.
- (5)

TECHNICAL SPECIFICATIONS BASES CONTROL PROGRAM

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1.8	REPORTING REQUIREMENTS
1.9	CHANGE CONTROL

1.1 PURPOSE

The purpose of this Program is to provide guidance for identifying, processing, and implementing changes to the Technical Specifications (TS) Bases. This Program implements and satisfies the requirements of TS 5.5.14, "Technical Specifications (TS) Bases Control Program."

This Program is applicable to the preparation, review, implementation, and distribution of changes to the TS Bases. This Program also provides guidance for preparing TS Bases Change Packages for distribution.

1.2 REFERENCES

- 1. TS 5.5.14, "Technical Specifications (TS) Bases Control Program"
- 2. 10 CFR 50.4, "Written Communications"
- 3. 10 CFR 50.59, "Changes, Tests and Experiments"
- 4. 10 CFR 50.71, "Maintenance of Records, Making of Reports"
- 10 CFR 50.90, "Application for Amendment of License or Construction Permit"

1.3 DEFINITIONS AND/OR ACRONYMS

1. 10 CFR 50.59 REVIEW - A written regulatory evaluation which provides the basis for the determination that a change does, or does not, require NRC approval pursuant to 10 CFR 50.59. The scope of the evaluation should be commensurate with the potential safety significance of the change, but must address the relevant safety concerns included in the Safety Analysis Report and other owner controlled documents. The depth of the evaluation must be sufficient to determine whether or not NRC approval is required prior to implementation. Depending upon the significance of the change, the evaluation may be brief; however, a simple statement of conclusion is not sufficient.

- 2. EDITORIAL CHANGE - Editorial changes include correction of punctuation, insignificant word or title changes, style or format changes, typographical errors, or correction of reference errors that do not change the intent, outcome, results, functions, processes, responsibilities, or performance requirements of the item being changed. Changes in numerical values shall <u>not</u> be considered as editorial changes. Editorial changes do not constitute a change to the TRM and therefore do not require further 10 CFR 50.59 Reviews. If the full scope of this proposed change is encompassed by one or more of the below, then the change is considered editorial.
 - Rewording or format changes that do not result in changing actions to be accomplished.

Deletion of cycle-specific information that is no longer applicable.

- Addition of clarifying information, such as: Spelling, grammar, or punctuation changes Changes to references
 - Name or title references

1.4 PROGRAM DESCRIPTION

- A Licensee may make changes to the TS Bases without prior 1. NRC approval provided the changes do not require either of the following:
 - A change in the TS as currently incorporated in the a. license: or
 - b. A change to the Updated Final Safety Analysis Report (UFSAR) or TS Bases that requires NRC approval pursuant to 10 CFR 50.59.
- 2. Changes that meet the above criteria (i.e., 1.4.1.a or 1.4.1.b) shall be submitted to the NRC pursuant to 10 CFR 50.90 and reviewed and approved by the NRC prior to implementation.
- 3. The TS Bases shall be maintained consistent with the UFSAR.

- 4. If a change to the TS Bases is not consistent with the UFSAR, then the cognizant Engineer shall prepare and submit a UFSAR Change Package when the TS Bases Change Request is submitted to Regulatory Assurance (RA) for processing.
- 5. Changes to the TS Bases that do not require prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e), as modified by approved exemptions.
- 6. TS Bases changes associated with a TS Amendment shall be implemented consistent with the implementation requirements of the TS Amendment.
- 7. Cantera Licensing (CL) is responsible for the control and distribution of the TS Bases. In order to prevent distribution errors (i.e., omissions or duplications), CL shall maintain the master TS Bases distribution list.

1.5 PROGRAM IMPLEMENTATION

- 1. TS Bases Change Requestor identifies the need for a revision to the TS Bases and notifies the RA Licensing Engineer (i.e., hereafter referred to as RA LE). A TS Bases change can be initiated through any Stations' RA. TS Bases Change Requestor notifies their counterparts on the need for a change.
- 2. RA LE notifies their counterparts of identified need for revision to the TS Bases.
- 3. RA LE obtains concurrence from CL on the need for a change.

- 4. RA LE drafts TS Bases changes considering format, rules of usage, and technical adequacy.
- 5. CL Engineer (i.e., hereafter referred to as CLE) reviews the agreed upon TS Bases wording changes for consistency with format, rules of usage, and technical adequacy and provides final concurrence.
- 6. After concurrence of the TS Bases wording changes is obtained, CLE makes an electronic version available in a working directory for use in the preparation of the 10 CFR 50.59 REVIEW and Station Qualified Review (SQR) process. The CLE shall ensure that the master electronic TS Bases files are revised per step 14 below upon receiving SQR | approval. The Revision number in the footer should be a sequential number (i.e., 1, 2, etc.).

- 7. TS Bases Change Requestor provides a 10 CFR 50.59 REVIEW for | the TS Bases changes in accordance with appropriate plant procedures. An exception to this requirement applies when the changes are being requested in order to reflect an approved NRC Safety Evaluation (SE) associated with a site specific Operating License or TS change. The NRC SE is sufficient to support the changes provided it has been determined that the changes are consistent with and entirely bounded by the NRC SE. A 10 CFR 50.59 REVIEW shall be performed for TS Bases changes that reflect generic industry approval by an NRC SE to determine site specific applicability. A 10 CFR 50.59 REVIEW is not required for an EDITORIAL CHANGE.
- 8. TS Bases Change Requestor completes Attachment A, "Technical | Specifications Bases Change Request Form," as follows:

- a. Identifies the affected sections, and includes a copy of the proposed TS Bases changes;
- Briefly summarizes the changes including the LCO, Action, or Surveillance Requirement to which the changes apply;
- c. Briefly summarizes the reason for the changes and attaches all supporting documentation;
- d. Identifies any schedule requirements and proposed implementation date that apply (i.e., describe any time limitations that might apply which would require expedited processing). If the changes are outage related, then checks "yes" and lists the applicable outage identifier;
- e. Identifies any known implementation requirements such as procedure changes, UFSAR changes, Passport changes, Reportability Manual revisions, pre-implementation training requirements, etc.;
- f. If a 10 CFR 50.59 REVIEW was prepared to support the TS Bases changes, the Requestor then checks the appropriate box, lists the associated 10 CFR 50.59 REVIEW Number, and attaches the original;
- g. If the changes to the TS Bases are the result of an approved NRC SE associated with a site specific Operating License or TS change and the scope of the changes determined to be consistent with and entirely bounded by the NRC SE, then the Requestor checks the appropriate box and attaches a copy;
- h. If the changes to the TS Bases are EDITORIAL CHANGES, the the Requestor checks the appropriate box and no 10 CFR 50.59 REVIEW is required;
- i. Signs and dates as Requestor and identifies the originating department;
- j. Obtains approval to proceed from Department Supervisor (or designee); and
- k. Returns Attachment A to the RA LE.

- 9. RA LE reviews the TS Bases Change Request Form, including supporting documentation, and documents the review by signing Attachment A. The review verifies that the following information or documentation is included:
 - a. Completed 10 CFR 50.59 REVIEW. If the changes are related to an approved NRC SE associated with a site specific Operating License or TS change and determined to be entirely bounded by the NRC SE, then only a copy of the SE is required to be attached and no 10 CFR 50.59 REVIEW is required. A 10 CFR 50.59 REVIEW is not required for an EDITORIAL CHANGE;
 - Identification of known documents requiring revisions;
 and
 - c. Completed UFSAR Change Request with supporting documentation, in accordance with appropriate plant procedures, if applicable.
- 10. If the TS Bases change is not an EDITORIAL CHANGE, the RA LE/TS Bases Change Requestor obtains SQR approval of the TS Bases changes by performing the following:
 - a. RA LE prepares the TS Bases Change SQR package. The SQR package shall include Attachment A (including completed 10 CFR 50.59 REVIEW or NRC SE) and the revised TS Bases pages. Attachment A is provided for the purpose of reviewing and finalizing the implementation requirements and ensuring the necessary actions have been initiated. RA LE shall assign Action Tracking (AT) items, as necessary, to track implementation requirements;
 - b. TS Bases Change Requestor submits the TS Bases Change SQR package to the SQR Committee members for a preliminary review. The SQR composition shall include RA and Operating Departments in all cases; and
 - c. TS Bases Change Requestor resolves preliminary review comments and finalizes the TS Bases Change SQR package.
- 11. The RAM shall determine the need for Plant Operations Review | Committee (PORC) approval. The need for PORC approval shall be documented on Attachment A.

- 12. RA LE/TS Bases Change Requestor obtains PORC approval, if necessary.
- 13. RA LE notifies CLE of approval of the TS Bases changes by forwarding a copy of the approved SQR/PORC Change package to CLE.
- 14. After approval of the TS Bases changes by SQR/PORC, CLE ensures that the controlled master electronic files are updated.
- 15. RS/RA completes Attachment B, "Technical Specifications Bases Change Instruction Form," as follows:
 - a. CLE indicates the effective date of the TS Bases changes consistent with the SQR/PORC approval or TS amendment required implementation date. If the TS Bases change is a result of a TS Amendment, the update shall be implemented coincident with implementation requirements of the TS Amendment. Otherwise, the update must be implemented by the date indicated on Attachment B;
 - CLE lists each page to be removed and inserted, including the Affected Page List; and
 - c. RA LE provides the updated master file directory for updating Electronic Document Management System (EDMS), if applicable.
- 16. CLE creates a TS Bases Change Package. The TS Bases Change | Package shall consist of:
 - TS Bases Change Instruction Form (Attachment B);
 - b. Revised Affected Page List; and
 - c. Revised TS Bases pages.

One CLE shall assemble and approve the TS Bases Change Package for distribution and a second CLE shall perform a peer check to verify completeness of the TS Bases Change Package.

- of the TS Bases changes has been obtained and that all AT items assigned to track implementation requirements have been completed, CLE forwards the TS Bases Change Package to the RA LE as notification of the need to update the onsite TS Bases controlled copies and EDMS, if applicable. CLE also forwards the TS Bases Change Package to CL Records Management as notification of the need to update the offsite (CL) TS Bases controlled copies and to transmit updates to the offsite (non-CL) TS Bases controlled copies.
- 18. RA LE forwards the TS Bases Change Package to Station Records Management as notification of the need to update the onsite TS Bases controlled copies and EDMS, if applicable.
- 19. Upon completion of updating the onsite TS Bases controlled copies and EDMS (if applicable), Station Records Management Supervisor signs and dates Attachment B and returns Attachment B to the appropriate CLE.
- 20. Upon completion of updating the offsite (CL) TS Bases controlled copies and transmitting updates to the offsite (non-CL) TS Bases controlled copies, CL Records Management signs and dates Attachment B and returns Attachment B to the appropriate CLE.
- 21. RA LE ensures that the documentation required to be maintained as a quality record is provided to Station Records Management for the purpose of record retention.

1.6 ACCEPTANCE CRITERIA

Not applicable.

1.7 LCOARS/COMPENSATORY MEASURES

An Issue Report may need to be generated to provide proper tracking and resolution of noted problems associated with the implementation of this Program.

The RAM will be responsible for ensuring that Program failures have been resolved.

1.8 <u>REPORTING REQUIREMENTS</u>

TS Bases changes not requiring prior NRC approval, as described in Section 1.4 of this Program, shall be submitted to the NRC in accordance with 10 CFR 50.71(e).

1.9 CHANGE CONTROL

Changes to this Program, other than EDITORIAL CHANGES, shall include a 10 CFR 50.59 REVIEW and a SQR. The SQR composition shall include RA Department in all cases. For a change to this Program, PORC approval from all Stations is required. The concurrence shall be that the other Stations are implementing the same changes or that the changes have been reviewed and determined not to be applicable to the other Stations.

		A TECHNICAL SPECIFICAT	TTACHMENT A IONS BASES CHANGE REC	DUEST FORM
1.	Change Reques	t #:	Affected Bases Section	n(s):
2.	Description o	f changes:		
3.	Reason for ch	anges (attach all supp	porting documentation:);
4.	Schedule Requi Outage Relate Other (explain	d (check one)	□ No □ Yes,	Outage #
5.	Implementation Identify the Affected CO	Technical Require MRC Safety Evalua	on the following: ments Manual tion eport ion icenses lification mentation lations	
6.	Check one: 10 CFR NRC SE EDITOR	50.59 REVIEW Attached Attached, Changes cor IAL CHANGE, No 10 CFR	I, 10 CFR 50.59 REVIEW sistent with and ent 50.59 REVIEW required	W #: irely bounded by NRC SE 1
7.	Requestor:	(Signature)	/(Date)	(Department)
8.	Requesting Sup	pervisor Approval:	(Signature)	(Date)
9.	PORC Approval	Required:	☐ Yes	□ No
10.	Licensing Eng	ineer Review:	(Signature)	(Date)

ATTACHMENT B TECHNICAL SPECIFICATIONS BASES CHANGE INSTRUCTION FORM FOR ONSITE/OFFSITE DISTRIBUTION AND FOR UPDATING EDMS

Braidwood/Byron/Dresden/LaS	alle/QC (circle one) TS Base	s Revision #	
NOTE: This change is effect by (Date)	ive as of (SQR/PORC or Amendment	and shall be implement Implementation Date)	ted
Approved for distribution:	(CLE Signature)	/	
Verified:	(CLE Signature)	(Date)	

REMOVE Section	REMOVE Page	INSERT Section	INSERT Page	UPDATE EDMS Section	UPDATE EDMS Page
Affected Page List	All	Affected Page List	All	N/A	N/A
		tanissi filationis ir darik da et de establica			

ATTACHMENT B TECHNICAL SPECIFICATIONS BASES CHANGE INSTRUCTION FORM FOR ONSITE/OFFSITE DISTRIBUTION AND FOR UPDATING EDMS

Braidwood/Byron/Dresden/LaSa	alle/QC (circl	e one) TS Bases Re	vision #	
Station Records Management:				
Onsite Distribution Complete	ed: (Stati	on Records Mgmt. S	upr.) (Date)	Market Control of the
EDMS Update Completed:	(Stati	on Records Mgmt. S	upr.) (Date)	-
** Return this sheet to:	Cantera Licen Braidwood/Byr CANTERA	nsing ron/Dresden/LaSalle	/QC (circle one) CLE	
CL Records Management:				
Offsite (CL) Distribution Co	ompleted:	(CL Records Mgmt.	// (Date)	
Offsite (non-CL) Distributio	on Transmitted	: (CL Records Mgmt.) (Date)	
** Return this sheet to Bra	aidwood/Byron/	Dresden/LaSalle/QC	(circle one) CL	
Offsite (non-CL) Controlled	Copy Holders:			. Ан По то по по то то по то
Offsite (non-CL) Distributio	on Completed:	(Signature)	/	
** Return this sheet to:			S DEPARTMENT	

SAFETY FUNCTION DETERMINATION PROGRAM (SFDP) BRAIDWOOD

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1.9	CHANGE CONTROL

1.1 PURPOSE

The purpose of the SFDP is to ensure that the proper Actions are taken upon failure to concurrently meet two or more Technical Specifications (TS) Limiting Conditions for Operation (LCOs) such that multiple inoperabilities of Systems, Structures, or Components (SSCs) do not result in an undetected LOSS OF SAFETY FUNCTION (LOSF).

1.2 REFERENCES

- 1. Technical Specification LCO 3.0.6
- 2. TS Specification 5.5.15, "Safety Function Determination Program (SFDP)"
- 3. Maintenance Rule Scoping Manual

1.3 <u>DEFINITIONS AND/OR ACRONYMS</u>

- 1. ACTIONS In the LCO Actions section, it describes the Required Actions to be taken under designated Conditions within specified COMPLETION TIMES.
- 2. LOSS OF SAFETY FUNCTION (LOSF) A LOSF exists when, assuming no concurrent single failure and assuming no concurrent loss of offsite power or loss of emergency diesel generator(s), a safety function assumed in the accident analysis cannot be performed.
- 3. COMPLETION TIME In the LCO Actions section, it states the amount of time allowed to complete a Required Action.
- 4. COMPLETION TIME EXTENSION The additional amount of time a SUPPORTED SYSTEM may be inoperable due to its associated SUPPORT SYSTEM being inoperable. NOTE the inoperability of the SUPPORTED SYSTEM must only be directly attributed to its associated SUPPORT SYSTEM being inoperable and the SUPPORT SYSTEM Required Actions not specifically requiring entry into the SUPPORTED SYSTEMS Required Actions and associated COMPLETION TIMES.
- 5. CONDITION In the LCO Actions section, it describes the ways in which the requirements of an LCO can fail to be met.

- Safety Function Determination Program (SFDP) Appendix 0
- OPERABLE/OPERABILITY A system, subsystem, train, component, or device shall be OPERABLE when it is capable of performing its 1.3. 6. specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s).
 - 7. SAFETY FUNCTION - An accident mitigation feature required by NRC regulation, plant design or Technical Specifications normally composed of two trains of SUPPORTED and SUPPORT equipment.
 - 8. SUPPORTED SYSTEM - A SSC, required by the TS, which requires a SUPPORT SYSTEM to ensure its safety function can be performed. Process parameters or operating limits do not comprise SUPPORTED SYSTEMS for the purposes of implementing LCO 3.0.6.

1.3. 9. SUPPORT SYSTEM - A SSC which is needed by another TS LCO required SSC to perform a safety function.

> An example would be the Component Cooling Water (CC) System (SUPPORT SYSTEM) which is required by the Residual Heat Removal System (SUPPORTED SYSTEM) to fulfill the RH safety function. A SUPPORT SYSTEM may also be a SUPPORTED SYSTEM. An example is the Component Cooling Water (CC) System which needs the Essential Service Water (SX) System to fulfill its safety function.

****************** NOTE * * A SSC which monitors or maintains a process * parameter or operating limit is not a * SUPPORT SYSTEM for the purposes of implementing * LCO 3.0.6. An example is Rod Position Indication * which is used to monitor control rod insertion limits. Inoperability of the Rod Position * Indication System does not automatically suggest that the control rods are no longer within * insertion limits. Control rod insertion limits * are monitored separately and Actions are taken as * appropriate when insertion limits are not met * or if Surveillance Requirements can not be * performed when required. Likewise, parameter limits that could affect other parameter limits if exceeded are also not considered SUPPORT SYSTEM for the purposes * of implementing LCO 3.0.6. An example is that * exceeding control rod insertion limits could * affect hot channel factors. *****************

1.4 PROGRAM DESCRIPTION

TS LCO 3.0.2 states that upon discovery of a failure to meet an LCO, 1. the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6. LCO 3.0.6 provides an exception to LCO 3.0.2 for SUPPORTED SYSTEMS by not requiring the Required Actions for the SUPPORTED SYSTEMS to be performed when the failure to meet an LCO is solely due to a SUPPORT SYSTEM LCO not being met. In this situation, although the SUPPORTED SYSTEM is declared inoperable, LCO 3.0.6 requires only the Conditions and Required Actions of the SUPPORT SYSTEM to be performed. The Conditions and Required Actions for the SUPPORTED SYSTEM are not required to be performed (i.e., cascading to the SUPPORTED SYSTEM) per LCO 3.0.6.

There are two types of SUPPORT SYSTEMS which must be considered when implementing LCO 3.0.6: (1) those addressed in Technical Specifications, and (2) those which are not. If the required SUPPORT SYSTEM is not addressed in the Technical Specifications, the impact of the SUPPORT SYSTEM inoperability must be evaluated with respect to any SUPPORTED SYSTEM which is addressed in Technical Specifications. An example of this is the loss of a ventilation system for which there is no LCO. If the equipment supported by the ventilation system were subsequently exposed to freezing conditions, then all affected systems which have an LCO must be evaluated to ensure that they remain OPERABLE and that there is no LOSF.

If the SUPPORT SYSTEM is addressed in the Technical Specifications, only the SUPPORT SYSTEM LCO must be entered per LCO 3.0.6 (i.e., "cascading" to the SUPPORTED SYSTEM is not required). However, the SUPPORT SYSTEM inoperability must still be evaluated with respect to the existing plant conditions to ensure that a LOSF does not exist. An example of this is the loss of component cooling water to one residual heat removal (RHR) heat exchanger. If the electrical bus supplying the second RHR pump were also removed from service, a LOSF may exist following a loss-of-coolant-accident and this plant configuration must be evaluated. It should be noted that for cases in which the inoperable SUPPORT SYSTEM is addressed in Technical Specifications, "cascading" can still be performed. LCO 3.0.6 only provides an option for not cascading at the discretion of operations.

1.4. 2. If the exception of 3.0.6 is utilized, additional evaluations and limitations may be required in accordance with Specification 5.5.15, "Safety Function Determination Program (SFDP)" (Reference Figure 1).

If a LOSF is determined to exist by this Program, the appropriate Conditions and Required Actions of the LCO in which the LOSF exists are required to be entered. When a SUPPORT SYSTEM'S Required Action directs a SUPPORTED SYSTEM to be declared inoperable or directs entry into Conditions and Required Actions for a SUPPORTED SYSTEM, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

3. Since "cascading" is not required when applying 3.0.6, a possibility exists that unrelated concurrent failures of more than one system could result in the complete loss of both trains of a SUPPORTED SYSTEM. Therefore, upon a failure to meet two or more LCOs during the same time period, an evaluation shall be conducted to determine if a LOSF exists. Generally, this is done by confirming that the remaining required redundant SSCs are OPERABLE. If a LOSF does exist, the SFDP directs that the appropriate actions be taken.

1.4. 4. A single component inoperability may result in multiple inoperabilities within a single train and affect multiple TS LCOs. LCO 3.0.6 limits the amount of "cascading" Actions that are required when an inoperable SSC renders a SUPPORT SYSTEM inoperable.

A LOSF evaluation must only be performed when equipment is inoperable in more than one train. For multiple inoperabilities within a single train, whether separate inoperabilities or inoperabilities of SUPPORTED SYSTEM(S) due to the inoperability of a SUPPORT SYSTEM, compliance with the Required Actions within the LCOs as directed by LCO 3.0.2 and LCO 3.0.6 is sufficient to ensure safe operation.

If the inoperable system is a SUPPORT SYSTEM and its Required Actions have not been pre-evaluated in combination with other inoperabilities as noted in Table 1, then perform a LOSF evaluation in accordance with Section 1.5. LCO's which are not SUPPORT SYSTEMS may also result in a LOSF when taken in combination with additional inoperabilities. Therefore, a LOSF evaluation is required and the Required Actions of the applicable LCOs shall be met in accordance with LCO 3.0.2.

1.4. 4. (CONTINUED)

If more than one LCO's Required Actions have been entered, then determine if all the LCOs have been entered for the same train.

- a. If the LCOs have been entered for the same train, then no LOSF exists provided the redundant equipment on the opposite train is not inoperable for other reasons. No further evaluation is required.
- b. If the LCOs have been entered for different trains, then a LOSF evaluation shall be performed to determine if the initial inoperability(ies), in conjunction with subsequent inoperability(ies) in the required redundant train, results in the loss of a safety function. This evaluation shall address the following examples:
 - 1) A required system redundant to the system(s) supported by the inoperable SUPPORT SYSTEM is also inoperable (see Figure 2, Example 1); or
 - 2) A required system redundant to the system(s)in turn supported by the inoperable SUPPORTED SYSTEM is also inoperable (see Figure 2, Example 2); or
 - 3) A required system redundant to the SUPPORT SYSTEM(s) for the SUPPORTED SYSTEMs (a) and (b) above is also inoperable (see Figure 2, Example 3).

For a TS related SUPPORT SYSTEM, Table 1 may be used as a guide for evaluating SUPPORT/SUPPORTED SYSTEM(s) relationships between TS systems.

Inoperable SSC(s) should be evaluated if the inoperability impacts the ability of the SSC(s) to perform its required safety function.

1.5 PROGRAM IMPLEMENTATION - LOSS OF SAFETY FUNCTION (LOSF) EVALUATION

******************* NOTE * If an LCO is not met for a SUPPORT SYSTEM, and the 1. * SUPPORT SYSTEM Actions direct the Actions for the * SUPPORTED SYSTEMS be entered, enter the appropriate Actions for the SUPPORTED SYSTEMS. * * * * If a SUPPORTED SYSTEM LCO is not met solely due to a SUPPORT SYSTEM inoperability, and the SUPPORT SYSTEM Actions do not direct that Actions for the * * SUPPORTED SYSTEMS be entered, then do not enter the * Actions for the SUPPORTED SYSTEMS per LCO 3.0.6. * * * *

1. Identify if the degraded SSC renders a TS required SSC inoperable. If NO, then no further evaluation is necessary.

- 2. If YES, then enter the LCOAR for the inoperable SSC.
- 3. Determine if the inoperable SSC is also a SUPPORT SYSTEM SSC.
- 4. If YES, then identify all TS required SUPPORTED SYSTEM SSC's that are rendered inoperable as a result of this LCOAR entry.
- 5. If the SUPPORT SYSTEM SSC Required Actions direct performance of any SUPPORTED SYSTEM SSC Required Action(s), then enter the LCOAR for the SUPPORTED SYSTEM SSC as directed and perform the Required Actions.
- 6. For ALL inoperable SUPPORT and SUPPORTED SYSTEM SSC's, perform an evaluation to ensure a LOSF does not exist for current plant conditions. Perform cross-train checks to ensure redundant trains are fully operational.

- 1.5. 7. If <u>any</u> redundant train SSC is NOT fully Operational, then one of the following conditions will apply:
 - a. The SSC is part of a single LCO with multiple subsystems and the LCO specified function is intact. NO LOSF exists for this specific SSC.
 - b. The SSC will still perform it's required Safety Function as defined in the Safety Analysis Report (SAR). NO LOSF exists for this specific SSC.
 - c. A LOSF exists. Enter the LCOAR and perform the Required Actions of the SSC in which the LOSF exists for the specific Condition(s) that apply.
 - 8. If No LOSF exists, for all SUPPORTED SYSTEM SSC's which are rendered inoperable, perform one of the following actions:
 - a. Enter the LCOAR(s) for each inoperable SSC and perform the Conditions and Required Actions as directed (Cascading), OR
 - b. Declare the SUPPORTED SYSTEM SSC(s) inoperable and apply LCO 3.0.6 to preclude entry into the Conditions and Required Actions associated with the inoperable SUPPORTED SYSTEM SSC(s). Track the inoperable SSC(s) on the Delayed LCOAR Entry Table of the inoperable SUPPORT SYSTEM SSC LCOAR.

NOTE: Examples of LOSF evaluations may be found in Figures 1 and 2, and Attachment 2.

1.6 ACCEPTANCE CRITERIA

Not Applicable.

1.7 LCOARS/COMPENSATORY MEASURES

The Shift Manager is responsible for initiating any LCOARs or Compensatory Measures resulting from the LOSF evaluation. In addition, an Issue Report (IR) may be generated to provide proper tracking and resolution of noted problems associated with the implementation of this program.

1.8 <u>REPORTING REQUIREMENTS</u>

This will be evaluated on a case-by-case situation.

1.9 CHANGE CONTROL

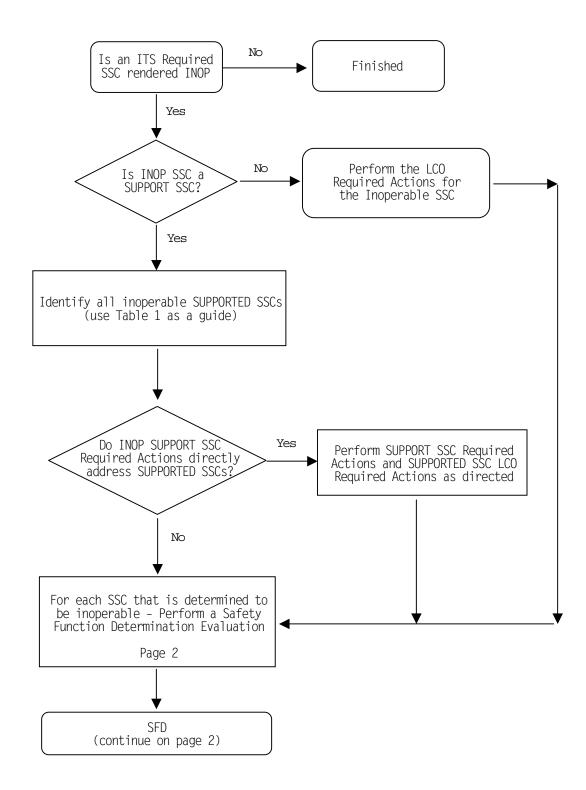
Changes to this Program, other than editorial changes, shall include a 10CFR50.59 Review and a Station Qualified Review (SQR). The SQR composition shall include the Regulatory Assurance Department in all cases. As a part of the SQR, Byron and Braidwood Plant Operations Review Committee (PORC) is required as determined by the Regulatory Assurance Manager. Byron and Braidwood shall implement the same change unless the change being implemented at Braidwood has been reviewed and was determined not to be applicable to Byron.

FIGURES 1 and 2

SFDP FLOWCHART

SUPPORT/SUPPORTED SYSTEM DIAGRAM

SAFETY FUNCTION DETERMINATION PROGRAM (SFDP)



SAFETY FUNCTION DETERMINATION PROGRAM (SFDP)

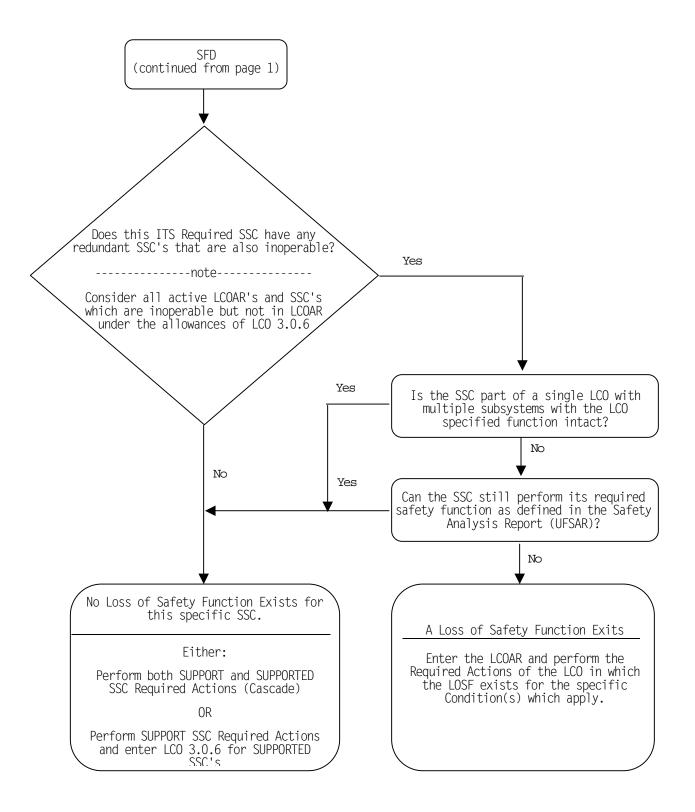


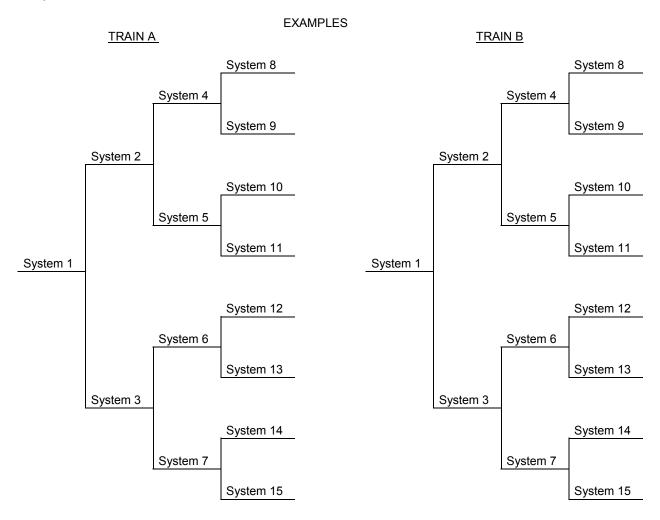
FIGURE 2 SUPPORT/SUPPORTED SYSTEM DIAGRAM

EXAMPLE 1

A LOSF may exist when a SUPPORT SYSTEM is inoperable, and:

A required system redundant to the system(s) supported by the inoperable SUPPORT SYSTEM is also inoperable.

If System 2 of Train A is inoperable, and System 5 of Train B is inoperable, a LOSF exists in SUPPORTED SYSTEM 5, 10, 11.



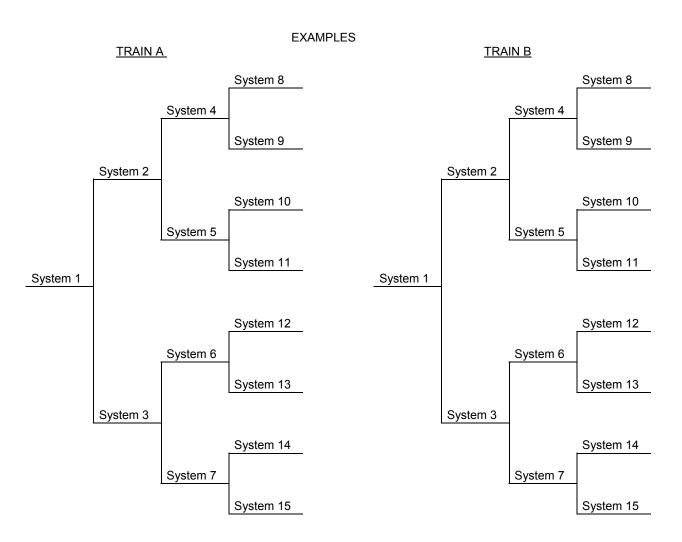
Note: Chart reads from left to right, i.e., System 1 is a SUPPORT SYSTEM for Systems 2 through 15.

FIGURE 2 SUPPORT/SUPPORTED SYSTEM DIAGRAM EXAMPLE 2

A LOSF may exist when a SUPPORT SYSTEM is inoperable, and:

A required system redundant to the system(s) in turn supported by the inoperable SUPPORTED SYSTEM is also inoperable.

If System 2 of Train A is inoperable, and System 11 of Train B is inoperable, a LOSF exists in System 11 which is in turn supported by System 5.



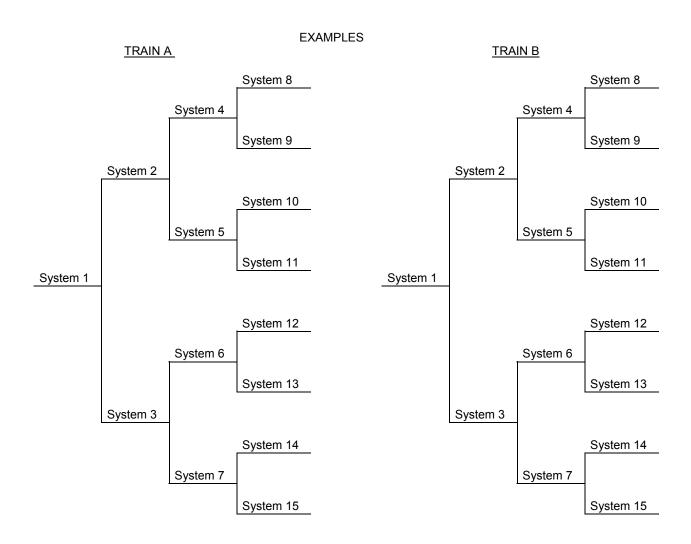
Note: Chart reads from left to right, i.e., System 1 is a SUPPORT SYSTEM for Systems 2 through 15.

FIGURE 2 SUPPORT/SUPPORTED SYSTEM DIAGRAM EXAMPLE 3

A LOSF may exist when a SUPPORT SYSTEM is inoperable, and:

A required system redundant to the SUPPORT SYSTEM(S) for the SUPPORTED SYSTEMS (a) and (b) above is also inoperable.

If System 2 of Train A is inoperable, and System 1 of Train B is inoperable, a LOSF Exists in Systems 2, 4, 5, 8, 9, 10 and 11.



Note: Chart reads from left to right, i.e., System 1 is a SUPPORT SYSTEM for Systems 2 through 15.

TABLE 1 - SUPPORT SYSTEM TO SUPPORTED SYSTEM TS REFERENCE

TABLE 1 (page 1 of 7) SUPPORT SYSTEM TO SUPPORTED SYSTEM TS CROSS REFERENCE

Support System TS Number	Support System	Supported System TS Number	Supported System
3.3.2	Engineered Safety Feature Actuation	3.3.1	Reactor Trip System (RTS) Instrumentation
	System (ESFAS) Instrumentation	3.3.6	Containment Ventilation isolation Instrumentation
	THE CHARLET CALLET	3.3.7	Control Room Ventilation (VC) Filtration System
		3.3.8	Actuation Instrumentation Fuel Handling Building Exhaust Filter Plenum (FHB)System Actuation Instrumentation
		3.5.2 3.5.3 3.6.3 3.6.6	ECCS - Operating ECCS - Shutdown Containment Isolation Valves Containment Spray and
		3.6.7 3.7.2	Cooling Systems Spray Additive System Main Steam Isolation Valves (MSIVs)
		3.7.5	Auxiliary Feedwater (AF) System
		3.7.7 3.7.8	Component Cooling Water (CC) Essential Service Water (SX)
		3.7.10	System Control Room Ventilation (VC) Filtration System
		3.7.11	Control Room Ventilation (VC) Temp Control System
		3.7.12	Nonaccessible Area Exhaust Filter Plenum Ventilation
		3.7.13	System Fuel Handling Exhaust Filter Plenum (FHB) Ventilation
		3.8.1	System AC Sources - Operating
3.3.5	Loss of Power (LOP) Diesel Generator (DG) Start Instrumentation	3.8.1 3.8.2	AC Sources - Operating AC Sources - Shutdown

TABLE 1 (page 2 of 7) SUPPORT SYSTEM TO SUPPORTED SYSTEM TS CROSS REFERENCE

Support System TS Number	Support System	Supported System TS Number	Supported System
3.3.6	Containment Ventilation Isolation Instrumentation	3.6.3 3.9.4	Containment Isolation Valves Containment Penetrations
3.3.7	Control Room Ventilation (VC) Filtration System Actuation Instrumentation	3.7.10	Control Room Ventilation (VC) Filtration System
3.3.8	Fuel Handling Building Exhaust Filter Plenum (FHB) Ventilation System Actuation Instrumentation	3.7.13	FHB Ventilation System
3.4.14	RCS Pressure Isolation Valve (PIV) Leakage	3.4.6 3.4.13 3.5.2 3.5.3	RCS Loops - Mode 4 RCS Operational Leakage ECCS - Operating ECCS - Shutdown
3.4.17	RCS Loop Isolation Valves	3.3.9 3.4.4 3.4.5 3.4.6 3.4.12	BDPS RCS Loops - MODES 1 and 2 RCS Loops - MODE 3 RCS Loops - MODE 4 LTOP System
3.5.4	Refueling Water Storage Tank (RWST)	3.3.9 3.5.2 3.5.3 3.6.6	BDPS ECCS - Operating ECCS - Shutdown Containment Spray and Cooling Systems
3.5.5	Seal Injection Flow	3.5.2	ECCS - Operating
3.6.2	Containment Airlocks	3.6.1	Containment

TABLE 1 (page 3 of 7) SUPPORT SYSTEM TO SUPPORTED SYSTEM TS CROSS REFERENCE

Support System TS Number	Support System	Supported System TS Number	Supported System
3.6.3	Containment Isolation Valves	3.5.2 3.5.3 3.6.1 3.6.6 3.7.7 3.7.8	ECCS - Operating ECCS - Shutdown Containment Containment Spray and Cooling Systems Component Cooling System Essential Service Water (SX)
3.6.6	Containment Spray	3.6.7	Spray Additive System
3.7.6	Condensate Storage Tank	3.7.5	Auxiliary Feedwater (AF) System
3.7.7	Component Cooling Water (CC) System	3.4.4 3.4.5 3.4.6 3.4.7 3.4.8 3.5.2 3.5.3 3.9.5	RCS Loops - Modes 1 and 2 RCS Loops - Mode 3 RCS Loops - Mode 4 RCS Loops - Mode 5, Loops Filled RCS Loops - Mode 5, Loops not Filled ECCS - Operating ECCS - Operating ECCS - Shutdown Residual Heat Removal (RHR) Coolant Circulation-High Water Level Residual Heat Removal (RHR) Coolant Circulation-Low Water Level

TABLE 1 (page 4 of 7) SUPPORT SYSTEM TO SUPPORTED SYSTEM TS CROSS REFERENCE

Support System TS Number	Support System	Supported System TS Number	Supported System
3.7.8	Essential Service Water (SX) System	3.4.6 3.5.2 3.5.3 3.6.6 3.7.5 3.7.7 3.7.11 3.8.1 3.8.2	RCS Loops - Mode 4 ECCS - Operating ECCS - Shutdown Containment Spray and Cooling System Auxiliary Feedwater System Component Cooling Water (CC) System Control Room Ventilation (VC) Temperature Control System AC Sources - Operating (DG only) AC Sources - Shutdown (DG only)
3.7.9	Ultimate Heat Sink	3.7.5 3.7.8	"B" AFW System Essential Service Water (SX)

TABLE 1 (page 5 of 7) SUPPORT SYSTEM TO SUPPORTED SYSTEM TS CROSS REFERENCE

Support System TS Number	Support System	Supported System TS Number	Supported System
3.8.1	AC Sources - Operating	3.8.9	Distribution Systems - Operating (AC portion only)
3.8.3	Diesel Fuel Oil	3.8.1 3.8.2	AC Sources - Operating AC Sources - Shutdown
3.8.4	DC Sources - Operating	3.8.1 3.8.7 3.8.9	AC Sources - Operating Inverters - Operating Distribution Systems - Operating
0.0.5		3.4.12	LTOP System
3.8.5	DC Sources - Shutdown	3.4.12 3.8.2 3.8.8	LTOP System AC Sources - Shutdown Inverters - Shutdown
		3.8.10	Distribution Systems - Shutdown
3.8.6	Battery Parameters	3.8.4	DC Sources - Operating
		3.8.5	DC Sources - Shutdown
3.8.7	Inverters - Operating	3.8.9	Distribution Systems - Operating
3.8.8	Inverters - Shutdown	3.4.12	LTOP
		3.8.10	Distribution Systems - Shutdown

TABLE 1 (page 6 of 7) SUPPORT SYSTEM TO SUPPORTED SYSTEM TS CROSS REFERENCE

Support System TS Number	Support System	Supported System TS Number	Supported System
3.8.9	Distribution Systems -	3.3.1	Reactor Trip System
	Operating	3.3.2	(RTS) Instrumentation Engineered Safety Feature Actuation System (ESFAS) Instrumentation
		3.3.3	Post Accident Monitoring (PAM) Instrumentation
		3.3.4 3.3.5	Remote Shutdown System Loss of Power (LOP) Diesel Generator (DG) Start Inst.
		3.3.6	Containment Ventilation Isolation
		3.3.7	Instrumentation Control Room Ventilation (VC) Filtration System Actuation Instrumentation
		3.3.8	Fuel Handling Building Exhaust Filter Plenum (FHB) Ventilation System Actuation Instrumentation
		3.4.5 3.4.6 3.4.9 3.4.11	RCS Loops - Mode 3 RCS Loops - Mode 4 Pressurizer Pressurizer Power
		3.4.12 3.4.15	Operated Relief Valves (PORVs) LTOP System RCS Leakage Detection Instrumentation
		3.5.2 3.5.3 3.6.3	ECCS - Operating ECCS - Shutdown Containment Isolation
		3.6.6	Valves Containment Spray and Cooling
		3.6.7 3.7.2	Systems Spray Additive Tank Main Steam Isolation Valves (MSIVs)
		3.7.4	Steam Generator Power Operated Relief Valves
		3.7.5 3.7.7	Auxiliary Feedwater (AF) System Component Cooling Water (CC) System
		3.7.8	Essential Service Water (SX) System
		3.7.9 3.7.10	Ultimate Heat Sink Control Room Ventilation (VC) Filtration System
		3.7.11	Control Room Ventilation (VC) Temperature Control System
		3.7.12	Nonessential Area Exhaust Filter Plenum Ventilation System
		3.7.13	Fuel Handling Building (FHB) Ventilation System
		3.8.1 3.8.4 3.8.7	AC Sources - Operating DC Sources - Operating Inverters - Operating

TABLE 1 (page 7 of 7) SUPPORT SYSTEM TO SUPPORTED SYSTEM TS CROSS REFERENCE

Support System TS Number	Support System	Supported System TS Number	Supported System
Number		Number	
3.8.10	Distribution Systems -	3.3.1	Reactor Trip System (RTS)
	Shutdown	3.3.6	Containment Ventilation Isolation
		3.3.7	Instrumentation Control Room Ventilation (VC) Filtration System Actuation
		3.4.7	Instrumentation RCS Loops - Mode 5,
		3.4.8	Loops Filled RCS Loops - Mode 5,
		3.4.12 3.7.10	Loops Not Filled LTOP System Control Room Ventilation (VC) Filtration System
	3.7.11	Control Room Ventilation (VC) Temperature Control System	
	3.7.12	Nonaccessible Area Exhaust Filter Plenum Ventilation System	
		3.7.13	Fuel Handling Building Exhaust Filter Plenum (FHB) Ventilation System
		3.8.1 3.8.2 3.8.4 3.8.5 3.8.7 3.9.3 3.9.4 3.9.5	AC Sources - Operating AC Sources - Shutdown DC Sources - Operating DC Sources - Shutdown Inverters - Operating Nuclear Instrumentation Containment Penetrations Residual Heat Removal (RHR) and Coolant
		3.9.6	Circulation - High Water Level Residual Heat Removal (RHR) and Coolant Circulation - Low Water Level

TRM Safety Function Determination Program (SFDP) Appendix O

ATTACHMENT 1

LCOAR FORMAT

SAFETY FUNCTION DETERMINATION PROGRAM REQUIREMENTS

A. Loss of Safety Function (LOSF) Evaluation

Is there <u>any</u> inoperable or degraded SUPPORT SYSTEM or SUPPORTED SYSTEM equipment on the opposite/redundant train that, when coupled with this inoperable equipment, might result in a complete loss of a Tech Spec required safety function.

- 1. NO No LOSF exists. No further evaluation is necessary.
- 2. YES A LOSF may exist. Using the SFDP and BwAP 340-1, evaluate which of the following conditions apply:
 - a. The SSC is part of an LCO with multiple subsystems and the LCO specified function is intact. No LOSF exists.
 - b. The SSC will still perform its required safety function as defined in the Safety Analysis Report (SAR). No LOSF exists.
 - c. A LOSF exists. Perform the Required Actions of the SSC LCO in which the LOSF exists for the specific Condition(s) that apply.

LCO 3.0.6 - DELAYED LCOAR ENTRY CALCULATION.

Perform this step only if NO LOSF exists and it is desired to delay SUPPORTED SYSTEM LCOAR entry as allowed by LCO 3.0.6. A LOSF does not exist if the redundant train of the inoperable SUPPORTED SYSTEM(S) equipment is OPERABLE.

- 1. Rules of Usage:
 - a. With a single SUPPORT SYSTEM inoperable, the affected SUPPORTED SYSTEM(s) LCOAR entry(s) is not required to be entered unless directed by the SUPPORT SYSTEM Required Actions.
 - b. In the event additional SUPPORT SYSTEM(s) become inoperable during the Completion Time for restoration of the first SUPPORT SYSTEM, the LCOAR entry(s) of the SUPPORTED SYSTEM may be delayed by either the maximum allowed Completion Time of the SUPPORT SYSTEMs, <u>OR</u> 2 times the Completion Time for restoration of the SUPPORTED SYSTEM (applied at the time the second SUPPORT SYSTEM becomes inoperable), <u>whichever is</u> less.

- 2. When tracking delayed LCOAR entry times, it is imperative that the INOPERABLE TIME/DATE and required LCOAR entry TIME/DATE reflect the total time the SUPPORTED SYSTEM has been inoperable. A review of all active LCOARS must be performed to ensure SUPPORTED SYSTEM(s) do not remain inoperable for longer than allowed in 1.b. above.
- B. SUPPORT SYSTEM to SUPPORTED SYSTEM Tech Spec cross reference is found in the SFDP. Complete the following table(s) for all inoperable SUPPORTED SYSTEMS for the purpose of tracking delayed LCOAR entry given subsequent additional SUPPORT SYSTEM inoperabilities.

Table 1: Supported System delayed LCOAR entry Table: (example)

SUPPORT SYSTEM: LCO 3.7.7 Component Cooling Water

SUPPORTED SYSTEM TS NUMBER	SUPPORTED SYSTEM	INOPERABLE TIME / DATE	Enter LCOAR TIME / DATE
3.4.4 3.4.5 3.4.6 3.4.7 3.4.8 3.5.2	RCS Loops - Modes 1 & 2 RCS Loops - Mode 3 RCS Loops - Mode 4 RCS Loops - Mode 5, Loops filled RCS Loops - Mode 5, Loops not filled ECCS - Operating		
3.5.3 3.9.5 3.9.6	ECCS - Shutdown RHR Coolant Circulation - High Water Level RHR Coolant Circulation - Low Water Level		

Table 2: ANY/All other SUPPORTED SYSTEMS which are inoperable as a result of the SUPPORTED SYSTEM(S) identified in table 1 above.

SUPPORTED SYSTEM TS NUMBER	2nd / 3rd LEVEL SUPPORTED SYSTEM	INOPERABLE TIME / DATE	Enter LCOAR TIME / DATE
	(none pre-identified)		

ATTACHMENT 2 SFDP EVALUATION EXAMPLES

ATTACHMENT 2

ITEMS CLEARLY INOPERABLE

- A. A SSC that is unable to perform its specified function(s) because of obvious failure, damage, or malfunction, or because it is disabled for testing or maintenance is inoperable.
- B. A SSC that trips (where tripped is not the safety function condition) is inoperable unless it can be restarted promptly, without performing maintenance. If the attempt at restart is unsuccessful, the SSC is inoperable. The time frame for compensatory action begins at the time of the initial trip.
- C A SUPPORTED SSC is inoperable when a SUPPORT SYSTEM is not capable of performing its related support function. However, if it is determined that the SSC is capable of performing its intended function, even with an inoperable SUPPORT SYSTEM, then the TS SUPPORTED SYSTEM may be considered OPERABLE.
- D. Failure of a SSC to meet quantitative acceptance criteria specified in Surveillance Procedures is inoperable unless the Surveillance Procedure acceptance criteria is more conservative than the existing TS SR acceptance criteria and the results of the surveillance is clearly within the acceptance criteria of the TS SR.
- E. A SSC is inoperable if it fails to meet a safety function requirement identified in a docketed letter to the NRC that specifically describes its functional capability/requirement.
- F. A SSC is inoperable if its configuration results in the LOSF or a loss of capability to withstand a single failure, if required.
- G. If calculation indicates that a SSC will not be able to perform as needed to mitigate the affects of a design basis accident, then the SSC is inoperable.

ITEMS POTENTIALLY INOPERABLE

- A. A suspected error in any analysis that could affect the functional status of a SSC.
- B. A lack of documentation that could affect the functional status of a SSC.
- C. A minor deviation (incorrect bolt size, tolerance/clearance, etc.) found in a SSC. Also included in this category are items such as unevaluated installation of lead shielding on a system or removal of a component from a system without using temporary restraints and without a prior Engineering evaluation.
- D. An unfulfilled EQ installation or maintenance requirement for a component or device where the impact is not obvious.
 - EXAMPLE: The EQ Program may require 0-rings be replaced with new 0-rings every time a cover is removed from a device and at least once every five years. The consequences of failure to replace the 0-ring at the end of the five year interval may not be clear, and may or may not cause the device to be inoperable.
 - EXAMPLE: An unidentified wire is found in an EQ valve operator and there is not sufficient information available to determine whether the wire is suitable for the application.
- E. An item found in nonconformance with electrical separation criteria specified in the UFSAR.
- F. An item found in noncompliance with physical separation or mechanical isolation requirements specified by Plant Drawings, Operating Procedures, Fire Hazards Analysis, etc.
- G. Equipment found out-of-tolerance in the nonconservative direction.
- H. When a SSC is found to be outside its design basis, it may be considered operable when it is judged that the SSC is capable of performing its specified functions(s). Further testing calculations, etc. may be required to support this position.
- I. Discovery of an unanalyzed condition associated with the current design basis (i.e., an unanalyzed condition which should have been analyzed).

SFDP EVALUATION - EXAMPLE 1

EXAMPLE 1: At 0100, with Unit 2 in MODE 1, the Unit 2 4160V "242" bus is determined to be inoperable due to degraded voltage. No other TS SSC inoperabilities exist.

The 4160 V "242" bus is a SUPPORT SSC, addressed by TS LCO 3.8.9. Required Action requires restoring the bus to OPERABLE status within 8 hours.

The following is the LOSF determination for the SUPPORTED SYSTEM:

- * LCO 3.3.1 RTS Instrumentation; all channels are capable of performing their design function; no LOSF exists.
- * LCO 3.3.2 EFSAS Instrumentation; all channels are capable of performing their design function; no LOSF exists.
- * LCO 3.3.3 PAM Instrumentation; since at least one channel is OPERABLE, no LOSF exists.
- * LCO 3.3.4 Remote Shutdown System; the functions of the PAM are still OPERABLE since the "241" 4160 V bus is OPERABLE, no LOSF exists.
- * LCO 3.3.5 LOP Diesel Generator Start Inst; since there is still one bus with two channels of loss of voltage Function and two channels of degraded voltage Function still OPERABLE, no LOSF exists.
- * LCO 3.3.6 Containment Ventilation Isolation Instrumentation; since one rad monitor is still OPERABLE, no LOSF exists.
- * LCO 3.3.7 Control Room Ventilation Filtration System Actuation Instrumentation; since the opposite train of the VC Filtration System is OPERABLE and powered by the offsite train, no LOSF exists.
- * LCO 3.3.8 Fuel Handling Building Exhaust Filter Plenum (FHB) Ventilation System Actuation Instrumentation; since the other channel is OPERABLE, no LOSF exists.

- LCO 3.4.9 Pressurizer; the Pressurizer is still OPERABLE since two groups of heaters is still OPERABLE, no LOSF exists.
- LCO 3.4.11 Pressurizer PORVs; since bus 241 is still OPERABLE the PORVs are OPERABLE since power is still being supplied, no LOSF exists.
- LCO 3.4.15 RCS Leakage Detection Instrumentation is not lost, no LOSF exists.
- * LCO 3.5.2 ECCS - Operating, because Charging, Safety Injection, and RHR are OPERABLE, no LOSF exists.
- LCO 3.6.3 Containment Isolation Valves; loss of one bus of the 4160 volt will not render the Containment Isolation Valves inoperable, no LOSF exists.
- LCO 3.6.6 Containment Spray and Containment Cooling Trains, Containment Cooling is not considered inoperable. No LOSF exists because only one train is required.
- LCO 3.6.7 Spray Additive Tank; with a loss of 242v bus, the spray Additive Tank is still OPERABLE, no LOSF exists.
- LCO 3.7.2 Main Steam Isolation Valves; there will be no loss * of function since the MSIVs will fail in the closed position.
- LCO 3.7.4 Steam Generator Power Operated Valves; no LOSF exists since the valves would be placed in a closed position which is their intended position for mitigation of an accident.

- * LCO 3.7.5 Auxiliary Feedwater is considered OPERABLE. No LOSF exists because only one train is required.
- * LCO 3.7.7 Component Cooling Water, is considered OPERABLE because the other subsystem is OPERABLE, no LOSF exists.
- * LCO 3.7.8 Essential Service Water is considered OPERABLE because SX can perform its safety function with one train no LOSF exists.
- * LCO 3.7.10 Control Room Ventilation Filtration System; the other train of VC Filtration System is still OPERABLE, no LOSF exists.
- * LCO 3.7.11 Control Room Ventilation Temperature Control System; the other train of VC Temperature Control is still OPERABLE, no LOSF exists.
- * LCO 3.7.12 Nonessential Area Exhaust Filter Plenum Ventilation System; the other 2 trains of Nonessential Area Exhaust Filter Plenum Ventilation System are OPERABLE, no LOSF exists.
- * LCO 3.7.13 Fuel Handling Building Ventilation System; the other train is still OPERABLE, no LOSF exists.
- * LCO 3.8.1 AC Sources-Operating; the opposite train is OPERABLE, no LOSF exists.
- * LCO 3.8.4 DC Sources Operating; the batteries and chargers are OPERABLE, no LOSF exists.
- * LCO 3.8.7 Inverters Operating; the other inverters are OPERABLE. no LOSF exists.

<u>Conclusions</u>: No LOSF exists. LCO 3.0.6 may be entered with a Completion Time of 8 hours to restore the inoperable bus to OPERABLE status, beginning at 0100.

SFDP EVALUATION - EXAMPLE 2

EXAMPLE 2:

At 0500, with Unit 2 in MODE 1, both channels of the Containment Radiation-High monitor are determined to be inoperable.

This instrumentation supports the Containment Ventilation Isolation instrumentation by providing input to the Automatic Actuation Logic and Actuation relays, and Containment Radiation-High. Since these supported functions require at least 2 channels, for the monitors, entry must be made into the Reguired Actions for LCO 3.3.6.

These Actions directly specify to enter applicable Conditions and Required Actions of LCO 3.6.3 for containment valves made inoperable by isolation instrumentation (Required Action B.1). In addition, Required Action C.2 requires entry into the applicable Conditions and Required Actions of LCO 3.9.4 for containment purge valves made inoperable by isolation instrumentation. As stated in LCO 3.0.6, when the SUPPORT SYSTEM SSC Required Actions provide direction for SUPPORTED SYSTEM SSCs, the applicable SUPPORTED SYSTEM SSC Conditions and Required Actions shall be entered. This effectively precludes the use of LCO 3.0.6.

<u>Conclusion:</u> The LCO 3.3.6 Required Actions should be performed, as well as those for all the inoperable SUPPORTED SYSTEMS. The SFDP will not be entered since LCO 3.0.6 cannot be used.

SFDP EVALUATION - EXAMPLE 3

EXAMPLE 3:

At 0130, with both Units at 100% power, the Spray Additive Tank is determined to be inoperable.

Per LCO Bases 3.6.7, the Spray Additive Tank provides sodium hydroxide through the suction of the Containment Spray Pumps and into the containment. The purpose of the sodium hydroxide is to provide iodine scrubbing in the case of a LOCA.

In the event the Spray Additive Tank is inoperable, it will not disable the Containment Spray Pump to perform its intended safety function which is to spray borated water from the RWST into containment in order to reduce pressure and temperature. Since this function will still be performed, even with the Spray Additive Tank inoperable, it is not considered to be a SUPPORT SYSTEM for the Containment Spray Pump.

The same is not true in the case where the Containment Spray Pump is inoperable. In this case the Containment Spray Pump is a SUPPORT SYSTEM for the Spray Additive Tank. If the Containment Spray Pump is inoperable, the sodium hydroxide, function of the Spray Additive Tank, will not be sprayed into containment. In this case the Spray Additive Tank is a SUPPORTED SYSTEM to the Containment Spray Pump.

<u>Conclusion:</u> Since the Spray Additive Tank is not a SUPPORT SYSTEM for the Containment Spray Pumps, both trains of Containment Spray are OPERABLE, and no LOSF exists.

SFDP EVALUATION - EXAMPLE 4

At 1300, Unit 1 was at 100% power and Train B Essential Service EXAMPLE 4: Water (SX) System became inoperable with the associated LCOAR implemented. At 1400, the Condensate Storage Tank (CST) becomes inoperable.

> Train B SX is a SUPPORT SYSTEM to the Auxiliary Feedwater (AF) Pumps (SUPPORTED SYSTEM). No LOSF exists at this time (1300 to 1359 hours) since Train A SX is intact and, being a cross-tied system, can supply all the SX needs to both trains of AF, etc. and since no redundant systems are inoperable. The Actions for SX (LCO 3.7.8, Action A.1) are entered. The Actions for AF (LCO 3.7.5) are not entered since AF is operable.

At 1400 hours, the CST becomes inoperable. The CST (LCO 3.7.6) is considered to be a SUPPORT SYSTEM to the AF. However, the CST is not the safety related water supply to the AF, it is only the preferred supply. At this point the plant is in 2 LCOs and a SFDP evaluation is warranted. In this case, the evaluation should show that no LOSF exists for the following reason:

> The CST does support the AF, however, the CST is not the safety related water supply to the AF, it is only the preferred supply. Therefore, the AF is not inoperable due to the CST being inoperable. Furthermore, SX remains available to AF.

Conclusion: A LOSF does not exist and Technical Specification 3.7.6 is entered for the CST inoperability.

COMPLETION TIME EXTENSIONS APPLICABLE TO THE SFDP EXAMPLES

RULES OF USAGE FOR COMPLETION TIME EXTENSIONS

1. <u>Single SUPPORT SYSTEM inoperable affecting SUPPORTED SYSTEM(s)</u>

With a single SUPPORT SYSTEM inoperable, the affected SUPPORTED SYSTEM(s) LCOARs entry(s) is not required to be entered unless directed by the SUPPORT SYSTEM Required Actions. Reference Case A.

2. <u>Multiple SUPPORT SYSTEMS become inoperable affecting the same SUPPORTED SYSTEM(s)</u>

When a SUPPORT SYSTEM becomes inoperable, the Required Action(s) LCOAR entry is not required to be entered unless directed by the SUPPORT SYSTEM Required Actions. In the event additional SUPPORT SYSTEM(s) become inoperable during the Completion Time of the first SUPPORT SYSTEM, the LCOAR entry(s) of the SUPPORTED SYSTEM(s) may be delayed by either:

a) The maximum allowed Completion Time of the SUPPORT SYSTEM(S)

0R

b) 2 times the Completion Time for restoration of the SUPPORTED SYSTEM (applied at the time the second SUPPORT SYSTEM becomes inoperable),

whichever is the shorter duration. Reference Cases B and C.

The SFDP requires declaring SUPPORTED SYSTEM(S) inoperable if a SUPPORT SYSTEM inoperability renders the SUPPORTED SYSTEM incapable of performing its required function. However, the Conditions and Required Actions of the SUPPORTED SYSTEM do not have to be entered (i.e., the LCO Required Actions are not entered) except as directed by the SUPPORT SYSTEM Required Actions.

Consequently, it is possible to have SUPPORTED SYSTEM(S) inoperable for longer periods of time than their respective Completion Time would allow on their own. Per Technical Specifications 5.5.15, the SFDP must include measures to ensure that the SUPPORTED SYSTEM's Completion Times are not inappropriately extended.

The Required Action may be delayed only if the inoperability is due solely to an inoperability of a SUPPORT SYSTEM. If a SUPPORTED SYSTEM is made directly inoperable, then the LCO and Required Actions are entered at the time of direct inoperability per LCO 3.0.2.

The following criteria apply to Completion Time extension:

CASE A:

If only one SUPPORT SYSTEM is inoperable, General Rule 1 applies and the SUPPORTED SYSTEM LCOAR entry need not be entered unless directed by the SUPPORT SYSTEM Required Actions.

Example:

Action Completion Time - 3 days Action Completion Time - 7 days System A (SUPPORTED SYSTEM) System B (SUPPORT SYSTEM)

LCOAR entry on SUPPORTED SYSTEM A is not required to be entered.

Case B:

The SUPPORT SYSTEMS become inoperable at different times. The LCOAR entry for the SUPPORTED SYSTEM may be delayed as follows:

Example:

System A (SUPPORTED SYSTEM) Action Completion Time - 7 days System B (SUPPORT SYSTEM) Action Completion Time - 3 days System C (SUPPORT SYSTEM) Action Completion Time - 3 days

System B and C support System A

System B (SUPPORT SYSTEM) is inoperable at T = 0 days

Therefore: System A (SUPPORTED SYSTEM) Conditions and Required Action(s) need not be entered unless directed by the System B (SUPPORT SYSTEM) Required Actions.

System C (SUPPORT SYSTEM) becomes inoperable 2 days after System B (SUPPORT SYSTEM) became inoperable. System B is still not OPERABLE.

Therefore: At T = 0 days until the second SUPPORT SYSTEM becomes inoperable, General Rule 1 is applied. At this point, System B (SUPPORT SYSTEM) Completion Time is 3 days. System A (SUPPORTED SYSTEM) LCOAR is not entered unless directed by the System B (SUPPORT SYSTEM) Required Actions.

At T = 2 days, System C (SUPPORT SYSTEM) becomes inoperable. System C (SUPPORT SYSTEM) also supports System A (SUPPORTED SYSTEM) initiating General Rule 2 at T = 2 days. System C (SUPPORT SYSTEM) has a Completion Time of 3 days. Therefore, the maximum Completion Time for this scenario is from T = 0 days to T = 3 days for System B (SUPPORT SYSTEM), and from T = 2 days to T = 5 days for System C (SUPPORT SYSTEM). The maximum delay time for System A (SUPPORTED SYSTEM) LCOAR entry is 5 days because:

System B (SUPPORT SYSTEM) Completion Time is T = 3 days

System C (SUPPORT SYSTEM) Completion Time is T = 5 days

T=5 days is the longer of the two completion times and is compared with the two times the SUPPORTED SYSTEMS's completion time for restoration. System C (SUPPORT SYSTEM) completion time is at T=5 days. System A (SUPPORTED SYSTEM) completion time limit is 2 X 7=14 days after T=2 days. T=2+14 or a total of 16 days. Since T=5 days is less than T=16 days, the maximum allowed delay time to enter the System A (SUPPORTED SYSTEM) LCOAR is the shorter of the two, 5 days.

CASE C:

Two SUPPORT SYSTEMS become inoperable at different times. The LCOAR entry for the SUPPORTED SYSTEM may be delayed as follows:

Example:

System A (SUPPORTED SYSTEM) Action Completion Time - 3 days Action Completion Time - 3 days System B (SUPPORT SYSTEM) System C (SUPPORT SYSTEM) Action Completion Time - 7 days

System B and C support System A

Case C1 - System B (SUPPORT SYSTEM) B becomes inoperable at T = 0 days.

System B (SUPPORT SYSTEM) with a Completion Time of 3 days, renders System A (SUPPORTED SYSTEM) inoperable. General Rule 1 is applied, which allows an overall Completion Time of 3 days for the System B (SUPPORT SYSTEM). The LCOAR for System A (SUPPORTED SYSTEM) is not required to be entered unless directed by the System B (SUPPORT SYSTEM) Required Actions.

At T = 1 day, System C (SUPPORT SYSTEM) becomes inoperable and has a Completion Time of 7 days. System C (SUPPORT SYSTEM) also supports System A (SUPPORTED SYSTEM). System B (SUPPORT SYSTEM) continues to remain inoperable through its Completion Time T=3days.

Once System C (SUPPORT SYSTEM) becomes inoperable concurrent with System B, General Rule 2 is applied at T=1, the Completion Times are:

T = 0 days to T = 3 days for System B (SUPPORT SYSTEM), and

T = 1 day to T = 8 days for System C (SUPPORT SYSTEM).

At T = 3 days System B (SUPPORT SYSTEM) is not declared OPERABLE, and the appropriate subsequent Required Actions of System B (SUPPORT SYSTEM) are entered. The Required Actions of System A (SUPPORTED SYSTEM) A are not entered (unless SUPPORT SYSTEM B or C Required Actions specifically direct them to be entered) until T = 7 days (2 times System A's Completion Time after T = 1 day).

T = 7 days is less than System C's T = 8 days Completion Time. Not entering the Required Actions for System A (SUPPORTED SYSTEM) is allowed under LCO 3.0.6 provided the inoperability of System A (SUPPORTED SYSTEM) is solely due to the inoperability of System B (SUPPORT SYSTEM) and subsequently System C (SUPPORT SYSTEM).

Case C2 - At T = 0 day, System B (SUPPORT SYSTEM) becomes inoperable, with a Completion Time of 3 days, and renders System A (SUPPORTED SYSTEM) inoperable. General Rule 1 is applied, which allows an overall Completion Time of 3 days for System B (SUPPORT SYSTEM).

At T = 1 days, System C (SUPPORT SYSTEM) becomes inoperable and has a Completion Time of 7 days. System C (SUPPORT SYSTEM) also supports System A (SUPPORTED SYSTEM). When System C (SUPPORT SYSTEM) becomes inoperable, General Rule 2 is triggered requiring System A (SUPPORTED SYSTEM) LCOAR entry no later than day 7 (2 x 3 days after T=1). The Completion Times are:

From T=0 day to T=3 days for System B (SUPPORT SYSTEM), and From T=1 day to T=8 days for System C (SUPPORT SYSTEM).

System B (SUPPORT SYSTEM) is declared OPERABLE at T = 2 days.

System C (SUPPORT SYSTEM) remains inoperable and consequently, System A (SUPPORTED SYSTEM) is <u>still</u> inoperable solely due to its SUPPORT SYSTEM (System C) being inoperable. At this point, General Rule 2 remains in effect to eliminate continuous alternating inoperabilities. This would allow the Required Action entry for System A (SUPPORTED SYSTEM) to still be delayed only until day 7 (T = 1 + 6 days).

CONTAINMENT LEAKAGE RATE TESTING PROGRAM BRAIDWOOD

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1.1 PURPOSE

This Program provides controls to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions including routine inspections, tests, and reporting requirements pursuant to Technical Specification (TS) 5.5.16, "Containment Leakage Rate Testing Program." The Program inspection and test frequencies and associated acceptance criteria shall be in accordance with the guidelines contained in Regulatory Guide 1.163, September 1995, NEI 94-01, Revision 0, and ANSI/ANS-56.8-1994 as modified by approved exceptions as specified in TS 5.5.16. Exceptions to the guidance in NEI 94-01, Revision 0 and ANSI/ANS-56.8-1994 are as stated in Regulatory Guide 1.163 and TS 5.5.16.

1.2 REFERENCES

- 1. Technical Specifications:
 - a. 3.6.1. "Containment"
 - b. 3.6.2, "Containment Air Locks"
 - c. 3.6.3. "Containment Isolation Valves"
 - d. 5.5.16, "Containment Leakage Rate Testing Program"
 - e. TS Amendment No. 149, "Request for Amendment to Technical Specification 5.5.16, "Containment Leakage Rate Testing Program,"" issued April 2, 2008

2. UFSAR:

- a. Section 6.2, "Containment Systems"
- b. Section 6.2.6.1, "Containment Integrated Leakage Rate Test"
- c. Section 6.2.6.2, "Containment Penetration Leakage Rate Test"
- 3. NRC/Industry Documents:
 - a. NEI 94-01 Rev. O, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50, Appendix J"

- b. ANSI/ANS-56.8-1994, "Containment System Leakage Testing Requirements"
- c. 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water Cooled Power Reactors"
- d. NRC Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program"
- e. NUREG 1493, "Performance-Based Containment Leak-Test Program"
- 4. Braidwood Maintenance Rule 10 CFR 50.65

1.3 DEFINITIONS AND/OR ACRONYMS

- 1. PERFORMANCE CRITERIA The performance standards against which test results are to be compared for establishing the acceptability of the containment system as a leakage-limiting boundary.
- 2. CONTAINMENT SYSTEM The principal barrier, after the reactor coolant pressure boundary, to prevent the release of quantities of radioactive material that would have a significant radiological effect on the health of the public.
- 3. OVERALL INTEGRATED LEAKAGE RATE The total leakage rate through all tested leakage paths, including containment welds, valves, fittings, and components that penetrate the containment system.
- 4. L_a The maximum allowable primary containment leakage rate, L_a , shall be 0.20% of the primary containment air weight per day at the calculated peak containment pressure (P_a).
- 5. P_a The maximum calculated primary pressure, P_a , (Unit 1 = 42.8 psig) (Unit 2 = 38.4 psig) for the design basis loss of coolant accident.
- 6. TYPE A TEST An Integrated Leakage Rate Test (ILRT) to measure the CONTAINMENT SYSTEM overall integrated leakage rate under conditions representing DBA containment pressure and systems alignments.

- 7. TYPE B TEST A Local Leakage Rate Test (LLRT) intended to detect or measure leakage across pressure-retaining or leakage-limiting boundaries other than valves, such as:
 - a. containment penetrations whose design incorporates resilient seals, gaskets, sealant compounds, expansion bellows, or flexible seal assemblies;
 - b. seals, including door operating mechanism penetrations, which are part of the primary containment; or
 - c. doors and hatches with resilient seals or gaskets except for seal-welded doors.
- 8. TYPE C TESTS A pneumatic Local Leakage Rate Test (LLRT) to measure containment isolation valve leakage rates.
- 9. UPPER CONFIDENCE LIMIT (UCL) A calculated value constructed from test data which places a statistical upper bound on the true integrated leakage rate (%/24h).
- 10. MINIMUM PATHWAY LEAKAGE RATE (MNPLR) The minimum leakage rate that can be attributed to a penetration leakage path (e.g., the smaller of either the inboard or outboard barrier's individual leakage rates).
- 11. MAXIMUM PATHWAY LEAKAGE RATE (MXPLR) The maximum leakage rate attributed to a penetration leakage path. The MXPLR is the larger, not the total, leakage of two valves in series.

1.4 PROGRAM DESCRIPTION

This Program provides administrative guidelines for the Braidwood Containment Leakage Rate Testing Program, guidelines for the coordination of inspection, trending, reporting, performance evaluation, repair, establishing surveillance intervals, and regulatory compliance for Type A, B, and C leakage testing.

10 CFR 50 Appendix J Option B allows the use of a performance-based program to perform the Type A, B, and C containment leakage testing. Program requirements are further defined in References 3.a, 3.b, 3.c, and 3.d. These documents require that periodic testing be conducted to verify the leakage integrity of the containment and those systems and components which penetrate the containment. The objective for monitoring performance of TYPE A TESTS focuses on verifying the leakage integrity of a passive

containment structure.

TYPE B and C TESTS focus on assuring that containment penetrations are essentially leak tight. The results of these tests are evaluated against performance criteria and the required testing intervals are adjusted based on the performance of the component/system.

Option B allows licensees with good ILRT performance history to reduce the TYPE A TEST frequency from three tests in 10 years to one test in 10 years. Exception to the Option B TYPE A TEST frequency is as specified in TS 5.5.16. For TYPE B and TYPE C TESTS, Option B allows Braidwood Station to reduce testing frequency based on the experience history of each component, and establish controls to ensure continued performance during the extended testing interval. Type B and C LLRT intervals utilize the requirements and guidance as stipulated in Reference 3.a and 3.d.

1.5 PROGRAM IMPLEMENTATION

Inspection, trending, reporting, performance evaluation, repair, surveillance intervals, and regulatory compliance for Type A, B, and C leakage testing shall be initiated and maintained in accordance with the Braidwood Containment Leakage Rate Testing Program.

1.6 ACCEPTANCE CRITERIA

Acceptance criteria for TYPE A TESTS are contained in applicable Station Procedures. Acceptance criteria for TYPE B and C TESTS are contained in applicable Station Procedures. The acceptance criteria specified in the individual leak rate test procedures are administrative guidelines that are used to help maintain low containment leakage rates. The acceptance criteria associated with the individual leak rate test procedures are not Technical Specification requirements with the exception of the personnel/emergency airlock door seals and overall air lock leakage. The acceptance criteria associated with the personnel/emergency airlock door seals and overall air lock leakage are as specified in TS 5.5.16.

1.7 <u>LCOARS/COMPENSATORY MEASURES</u>

If any abnormalities in containment leakage exceed the acceptance criteria, the Shift Manager will be immediately notified. The Shift Manager shall determine OPERABILITY status and implement a LCOAR as applicable. In addition, an Issue Report (IR) may need to be generated to provide proper tracking and resolution of noted problems associated with the implementation of this Program.

1.8 <u>REPORTING REQUIREMENTS</u>

Any reporting requirements associated with acceptance criteria of this Program not being met shall be reported in accordance with the requirements specified in the implementing procedures.

1.9 CHANGE CONTROL

Changes to this Program, other than editorial changes, shall include a 10 CFR 50.59 Review and a Station Qualified Review (SQR). The SQR composition shall include the Regulatory Assurance Department in all cases. As part of the SQR, Byron and Braidwood Plant Operations Review Committee (PORC) approval is required as determined by the Regulatory Assurance Manager. Byron and Braidwood shall implement the same change unless the change being implemented at Braidwood has been reviewed and was determined not to be applicable to Byron.

TECHNICAL REQUIREMENTS MANUAL CONTROL PROGRAM

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1.9	CHANGE CONTROL

1.1 PURPOSE

The purpose of this Program is to provide guidance for identifying, processing, and implementing changes to the Technical Requirements Manual (TRM). This Program implements and satisfies the requirements of TRM Section 1.6, "Technical Requirements Manual Revisions."

This Program is applicable to the preparation, review, implementation, and distribution of changes to the TRM. This Program also provides guidance for preparing TRM Change Packages for distribution.

1.2 <u>REFERENCES</u>

- 1. TRM Section 1.6, "Technical Requirements Manual Revisions"
- 10 CFR 50.4. "Written Communications"
- 10 CFR 50.59, "Changes, Tests and Experiments"
- 4. 10 CFR 50.71, "Maintenance of Records, Making of Reports"
- 5. 10 CFR 50.90, "Application for Amendment of License or Construction Permit"

1.3 <u>DEFINITIONS AND/OR ACRONYMS</u>

10 CFR 50.59 REVIEW - A written regulatory evaluation which provides the basis for the determination that a change does, or does not, require NRC approval pursuant to 10 CFR 50.59. The scope of the evaluation should be commensurate with the potential safety significance of the change, but must address the relevant safety concerns included in the Safety Analysis Report and other owner controlled documents. The depth of the evaluation must be sufficient to determine whether or not NRC approval is required prior to implementation. Depending upon the significance of the change, the evaluation may be brief; however, a simple statement of conclusion is not sufficient.

EDITORIAL CHANGE - Editorial changes include correction of punctuation, insignificant word or title changes, style or format changes, typographical errors, or correction of reference errors that do not change the intent, outcome, results, functions, processes, responsibilities, or performance requirements of the item being changed. Changes in numerical values shall <u>not</u> be considered as editorial changes. Editorial changes do not constitute a change to the TRM and therefore do not require further 10 CFR 50.59 Reviews. If the full scope of this proposed change is encompassed by one or more of the below, then the change is considered editorial.

- Rewording or format changes that do not result in changing actions to be accomplished.

Deletion of cycle-specific information that is no longer

applicable.

Addition of clarifying information, such as:
- Spelling, grammar, or punctuation changes

- Changes to references - Name or title references

1.4 PROGRAM DESCRIPTION

- 1. A Licensee may make changes to the TRM without prior NRC approval provided the changes do not require NRC approval pursuant to 10 CFR 50.59.
- 2. Changes that require NRC approval pursuant to 10 CFR 50.59 shall be submitted to the NRC pursuant to 10 CFR 50.90 and reviewed and approved by the NRC prior to implementation.
- 3. The TRM is part of the Updated Final Safety Analysis Report (UFSAR) by reference and shall be maintained consistent with the remainder of the UFSAR.
- 4. If a change to the TRM is not consistent with the remainder of the UFSAR, then the cognizant Engineer shall prepare and submit a UFSAR Change Package when the TRM Change Request is submitted to Regulatory Assurance (RA) for processing.
- 5. Changes to the TRM that do not require prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e), as modified by approved exemptions.

- 6. TRM changes associated with a Technical Specifications (TS)
 Amendment shall be implemented consistent with the implementation requirements of the TS Amendment.
- 7. RA is responsible for the control and distribution of the TRM. In order to prevent distribution errors (i.e., omissions or duplications), RA shall maintain the master TRM distribution list.

1.5 PROGRAM IMPLEMENTATION

- 1. TRM Change Requestor identifies the need for a revision to the TRM and notifies the RA Licensing Engineer (i.e., hereafter referred to as RA LE). A TRM change can be initiated through any Stations' RA. TRM Change Requestor notifies their counterparts on the need for a change.
- RA LE notifies their counterparts of identified need for revision to the TRM.
- RA LE assigns a TRM Change Request Number (CR #).
- RA LE drafts TRM changes considering format, rules of usage, and technical adequacy.
- 5. RA LE makes an electronic version of the proposed TRM changes available in a working directory for use in the preparation of the 10 CFR 50.59 REVIEW and Station Qualified Review (SQR) process. The RA LE shall ensure that the master electronic TRM files are revised per step 12 below upon receiving SQR approval. The Revision number in the footer should be a sequential number (i.e., 1, 2, etc.).

- 6. TRM Change Requestor provides a 10 CFR 50.59 REVIEW for the TRM changes in accordance with appropriate plant procedures. An exception to this requirement applies when the changes are being requested in order to reflect an approved NRC Safety Evaluation (SE) associated with a site specific Operating License or TS change. The NRC SE is sufficient to support the changes provided it has been determined that the changes are consistent with and entirely bounded by the NRC SE. A 10 CFR 50.59 REVIEW shall be performed for TRM changes that reflect generic industry approval by an NRC SE to determine site specific applicability. A 10 CFR 50.59 REVIEW is not required for an EDITORIAL CHANGE.
- 7. TRM Change Requestor completes Attachment A, "Technical Requirements Manual Change Request Form," as follows:
 - a. Identifies the affected sections, and includes a copy of the proposed TRM changes;
 - b. Briefly summarizes the changes including the TLCO, Action, Surveillance Requirement, or Bases (if applicable) to which the changes apply;
 - c. Briefly summarizes the reason for the changes and attaches all supporting documentation;
 - d. Identifies any schedule requirements and proposed implementation date that apply (i.e., describe any time limitations that might apply which would require expedited processing). If the changes are outage related, then checks "yes" and lists the applicable outage identifier;
 - e. Identifies any known implementation requirements such as procedure changes, UFSAR changes, Passport changes, Reportability Manual revisions, pre-implementation training requirements, etc.;

- f. If a 10 CFR 50.59 REVIEW was prepared to support the TRM changes, the Requestor then checks the appropriate box, lists the associated 10 CFR 50.59 REVIEW Number, and attaches the original;
- g. If the changes to the TRM are the result of an approved NRC SE associated with a site specific Operating License or TS change and the scope of the changes determined to be consistent with and entirely bounded by the NRC SE, then the Requestor checks the appropriate box and attaches a copy;
- h. If the changes to the TRM are EDITORIAL CHANGES, then the Requestor checks the appropriate box and no 10 CFR 50.59 REVIEW is required;
- Signs and dates as Requestor and identifies the originating department;
- j. Obtains approval to proceed from Department Supervisor (or designee); and
- k. Returns Attachment A to the RA LE.
- 8. RA LE reviews the TRM Change Request Form, including supporting documentation, and documents the review by signing Attachment A. The review verifies that the following information or documentation is included:
 - a. Completed 10 CFR 50.59 REVIEW. If the changes are related to an approved NRC SE associated with a site specific Operating License or TS change and determined to be entirely bounded by the NRC SE, then only a copy of the SE is required to be attached and no 10 CFR 50.59 REVIEW is required. A 10 CFR 50.59 REVIEW is not required for an EDITORIAL CHANGE;
 - Identification of known documents requiring revisions;
 and
 - c. Completed UFSAR Change Request with supporting documentation, in accordance with appropriate plant procedures, if applicable.
- 9. If the TRM change is not an EDITORIAL CHANGE, the RA LE/TRM Change Requestor obtains SQR approval of the TRM change by performing the following:

- a. RA LE prepares the TRM Change SQR package. The SQR package shall include Attachment A (including completed 10 CFR 50.59 REVIEW or NRC SE) and the revised TRM pages. Attachment A is provided for the purpose of reviewing and finalizing the implementation requirements and ensuring the necessary actions have been initiated. RA LE shall assign Action Tracking (AT) items, as necessary, to track implementation requirements;
- b. TRM Change Requestor submits the TRM Change SQR package to the SQR Committee members for a preliminary review. The SQR composition shall include RA and Operating Departments in all cases; and
- c. TRM Change Requestor resolves preliminary review comments and finalizes the TRM Change SQR package.
- 10. The RAM shall determine the need for Plant Operations Review Committee (PORC) approval. The need for PORC approval shall be documented on Attachment A.
- 11. RA LE/TRM Change Requestor obtains PORC approval, if necessary.
- 12. After approval of the TRM changes by SQR/PORC, RA LE ensures that the controlled master electronic files are updated.
- 13. RA LE completes Attachment B, "Technical Requirements Manual | Change Instruction Form," as follows:
 - a. Indicates the effective date of the TRM changes consistent with the SQR/PORC approval or TS amendment required implementation date. If the TRM change is a result of a TS Amendment, the update shall be implemented consistent with the implementation requirements of the TS Amendment. Otherwise, the update must be implemented by the date indicated on Attachment B;
 - Lists each page to be removed and inserted, including the Affected Page List; and
 - c. Provides the updated master file directory for updating Electronic Document Management System (EDMS), if applicable.

- 14. RA LE creates a TRM Change Package. The TRM Change Package shall consist of:
 - 1. TRM Change Instruction Form (Attachment B);
 - Revised Affected Page List; and
 - 3. Revised TRM pages.

One RA LE shall assemble and approve the TRM Change Package for distribution and a second RA LE shall perform a peer check to verify completeness of the TRM Change Package.

- 15. After verifying that SQR/PORC approval of the TRM changes has been obtained and that all AT items assigned to track implementation requirements have been completed, RA LE forwards the TRM Change Package to Station Records Management as notification of the need to update the onsite TRM controlled copies and EDMS, if applicable.
- 16. RA LE also forwards the TRM Change Package to Cantera Licensing (CL) Records Management as notification of the need to update the offsite (CL) TRM controlled copies and to transmit updates to the offsite (non-CL) TRM controlled copies.
- 17. Upon completion of updating the onsite TRM controlled copies and EDMS (if applicable), Station Records Management Supervisor signs and dates Attachment B and returns Attachment B to the RA LE.
- 18. Upon completion of updating the offsite (CL) TRM controlled copies and transmitting updates to the offsite (non-CL) TRM controlled copies, CL Records Management signs and dates Attachment B and returns Attachment B to the RA LE.
- 20. RA LE ensures that the documentation required to be maintained as a quality record is provided to Station Records Management for the purpose of record retention.

1.6 ACCEPTANCE CRITERIA

Not applicable.

1.7 LCOARS/COMPENSATORY MEASURES

An Issue Report may need to be generated to provide proper tracking and resolution of noted problems associated with the implementation of this Program.

The RAM will be responsible for ensuring that Program failures have been resolved.

1.8 REPORTING REQUIREMENTS

TRM changes not requiring prior NRC approval, as described in Section 1.4 of this Program, shall be submitted to the NRC in accordance with 10 CFR 50.71(e).

1.9 CHANGE CONTROL

Changes to this Program, other than EDITORIAL CHANGES, shall include a 10 CFR 50.59 REVIEW and a SQR. The SQR composition shall include RA Department in all cases. For a change to this Program, PORC approval from all Stations is required. The concurrence shall be that the other Stations are implementing the same changes or that the changes have been reviewed and determined not to be applicable to the other Stations.

ATTACHMENT A TECHNICAL REQUIREMENTS MANUAL CHANGE REQUEST FORM

1.	Change Reques	t #: /	Affected TRM Section((s):
2.	Description o			4.4.4.4.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1.1
3.	Reason for ch	anges (attach all supp		n):
4.	Schedule Requ Outage Relate Other (explain	irements: d (check one) n)	□ No □ Yes	, Outage #
5.	Implementation Identify the Affected O O O O O O O O O O O O O O O O O O	TS Bases RRC Safety Evaluation Fire Protection R RC Commitments Vendor Documentation Special Permits/L Procedures Environmental Quation Design Basis Documentation Design Basis Documentation RRC Information PRA Information Programs Reportability Man A Topical Report Passport Pre-Implementation RRC Safety RA Information Programs Reportability Man	on the following: tion eport ion icenses lification mentation lations ual n Training Required ulation Manual	
6.	Check one: 10 CFR NRC SE EDITOR	50.59 REVIEW Attache Attached, Changes co IAL CHANGE, No 10 CFR	d, 10 CFR 50.59 REVI nsistent with and en 50.59 REVIEW require	EW #: tirely bounded by NRC SE ed
7.	Requestor:	(Signature)	/(Date)	(Department)
8.	Requesting Su	pervisor Approval:	(Signature)	/(Date)
9.	PORC Approval	Required:	☐ Yes	□ No
10.	Licensing Eng	ineer Review:	(Signature)	// (Date)

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ATTACHMENT B TECHNICAL REQUIREMENTS MANUAL CHANGE INSTRUCTION FORM FOR ONSITE/OFFSITE DISTRIBUTION AND FOR UPDATING EDMS

Braidwood/Byron/Dresden/LaSalle/QC (circle one) TRM Revision #			
NOTE: This change is effecti by (Date)	ve as of(SQR/PORC or Amendment Implement	and shall be implemented tation Date)	
Approved for distribution:	(RA LE Signature)	(Date)	
Verified:	(RA LE Signature)	/ (Date)	

REMOVE Section	REMOVE Page	INSERT Section	INSERT Page	UPDATE EDMS Section	UPDATE EDMS Page
Affected Page List	A11	Affected Page List	All	N/A	N/A

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ATTACHMENT B TECHNICAL REQUIREMENTS MANUAL CHANGE INSTRUCTION FORM FOR ONSITE/OFFSITE DISTRIBUTION AND FOR UPDATING EDMS

Braidwood/Byron/Dresden/LaSa	lle/QC (circle	one) TRM Revision # _	(Control of the Control of the Contr	
Station Records Management:				
Onsite Distribution Complete	ed: (Statio	on Records Mgmt. Supr.)	(Date)	
EDMS Update Completed:	(Station Records Mgmt. Supr.) (Date)			mercurene
** Return this sheet to:	Regulatory Ass Braidwood/Byro	urance n/Dresden/LaSalle/QC (circle one) Statio	n
CL Records Management:				The State of the S
Offsite (CL) Distribution Co	empleted:	(CL Records Mgmt. Dep	t.) (Dat	e)
Offsite (non-CL) Distributio	on Transmitted:	(CL Records Mgmt. Dep	t.) (Dat	e)
** Return this sheet to:	Regulatory Ass Braidwood/Byro	surance n/Dresden/LaSalle/QC (circle one) Statio	n
Offsite (non-CL) Controlled	Copy Holders:			
Offsite (non-CL) Distribution	on Completed:	(Signature)	(Date)	Personal designation designati
** Return this sheet to:	EXELON GENERAT LICENSING AND 4300 WINFILED		ARTMENT	

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CONFIGURATION RISK MANAGEMENT PROGRAM BRAIDWOOD

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1.8	REPORTING REQUIREMENTS
1.9	CHANGE CONTROL

1.1 PURPOSE

This Configuration Risk Management Program provides a proceduralized process to ensure that a configuration risk assessment is conducted prior to and during performance of maintenance activities that remove SSCs from service.

1.2 REFERENCES

- 1. Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants"
- 2. Regulatory Guide 1.174, "An Approach for using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Licensing Basis"
- 3. Regulatory Guide 1.177, "An Approach for Plant-Specific-Risk-Informed Decisionmaking: Technical Specifications"
- 4. NUMARC 93-01, "Industry Guideline for Monitoring the Effectiveness of Maintenance at Nuclear Power Plants"

1.3 DEFINITIONS AND/OR ACRONYMS

- 1. Configuration Risk Management Program CRMP
- 2. Probabilistic Risk Assessment PRA
- 3. Structure, System, or Component SSC

1.4 PROGRAM DESCRIPTION

The CRMP is a subset of the work management process. The CRMP ensures that configuration risk is assessed (probabilistic and/or deterministic), and managed, prior to initiating any maintenance activity consistent with the requirements of 10 CFR 50.65. The CRMP also ensures that risk is reassessed if an emergent condition results in a plant configuration that has not been previously assessed.

Probabilistic risk assessments of online configurations are performed using the level 1 PRA model. Deterministic defense-indepth evaluations of key safety functions are performed for online and shutdown configurations using a safety function assessment module. Deterministic evaluations of plant configurations that result in a change to initiating event frequency and/or decrease in mitigation capability are performed using a plant transient assessment module.

The CRMP establishes risk thresholds and administrative limits for risk significant configuration out of service times to ensure that average baseline risk is maintained within an acceptable band.

Overall risk is managed to the most restrictive risk threshold specified within the CRMP. Risk significant configurations are generally avoided. If a risk significant configuration occurs, immediate actions are taken to protect redundant/diverse SSCs that are relied upon to mitigate events.

The CRMP requires that the PRA model meet industry certification standards to ensure the scope and quality of the PRA is adequate. The CRMP requires that the PRA model the current design configuration of the plant, and that plant modification and procedure changes are monitored and evaluated as to the impact on the PRA model. The CRMP establishes compensatory measures in the event a plant configuration is outside the scope of the PRA, or PRA results are unavailable.

1.5 PROGRAM IMPLEMENTATION

The CRMP is implemented through a company-wide standard procedure. The Work Control and Risk Management Engineering Departments are responsible for the CRMP and associated procedure implementation at the stations.

1.6 ACCEPTANCE CRITERIA

The configuration risk management acceptance criteria are contained within the implementing procedures.

1.7 LCOARS/COMPENSATORY MEASURES

The CRMP provides administrative limits for Technical Specification Limiting Condition of Operation Allowed Outage Time and Maintenance Rule unavailability time. When the administrative limit will be exceeded, compensatory measures are established to reduce risk, limit unavailability time, and implement a contingency plan to restore and/or mitigate the loss of a key safety function.

1.8 REPORTING REQUIREMENTS

The normal work management process and control room logs provide adequate documentation of configuration risk.

1.9 CHANGE CONTROL

Changes to this Program, other than editorial changes, shall include a 10 CFR 50.59 evaluation and an Independent Technical Review (ITR). The ITR composition shall include Regulatory Assurance Department in all cases. As a part of the ITR, for a change to this Program, concurrence from Byron and the Braidwood Plant Operations Review Committee (PORC) approval is required. The concurrence shall be that Byron is implementing the same change or that the change has been reviewed and determined not to be applicable to Byron.

BATTERY MONITORING AND MAINTENANCE PROGRAM BRAIDWOOD

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1.6	ACCEPTANCE CRITERIA
1.7	LCOARS/COMPENSATORY MEASURES
1.8	REPORTING REQUIREMENTS
1.9	CHANGE CONTROL

1.1 <u>PURPOSE</u>

This Program provides guidance and clarifying information related to the Battery Monitoring and Maintenance Program. This Program complies with the requirements of Technical Specification (TS) 5.5.17, "Battery Monitoring and Maintenance Program." This program provides for the restoration and maintenance of batteries based on the recommendations given in Reference 2.

1.2 REFERENCES

- 1. TS 5.5.17, "Battery Monitoring and Maintenance Program"
- 2. IEEE Standard 450-1995, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications"
- 3. UFSAR Chapter 8, "Electric Power"
- 4. NRC Regulatory Guide 1.129, "Maintenance, Testing and Replacement of Large Lead Storage Batteries for Nuclear Power Plants"

1.3 DEFINITIONS AND/OR ACRONYMS

- 1. ELECTROLYTE LEVEL The battery cell fluid level found by visual observation.
- 2. BATTERY CELL PARAMETERS Voltage, specific gravity, and resistance/impedance.
- 3. INTER-CELL/INTER-TIER or INTER-RACK CONNECTIONS Connections made between rows/steps or racks of individual battery cells.
- 4. FLOAT VOLTAGE The voltage applied to a battery to maintain it in a fully charged condition during normal operation.
- 5. SPECIFIC GRAVITY A measurement of an individual battery cell electrolyte to determine the state of charge.
- 6. ELECTROLYTE LEVEL MINIMUM ESTABLISHED DESIGN LIMIT 1/2 inch below the minimum level indication mark.
- 7. ELECTROLYTE TEMPERATURE MINIMUM ESTABLISHED DESIGN LIMIT 60°F.

1.4 PROGRAM DESCRIPTION

This Program ensures the methodologies, parameters, and corrective actions comply with the reference requirements. This Program addresses the station 125 VDC Engineered Safety Features (ESF) Batteries (Division 11(21) and Division 12(22)).

The OPERABILITY requirements for the 125 VDC ESF Batteries are defined in TS Limiting Conditions for Operation (LCOs) 3.8.4, "DC Sources - Operating," 3.8.5, "DC Sources - Shutdown," and 3.8.6, "Battery Parameters." LCO 3.8.6 delineates the limits on battery float current as well as electrolyte temperature, level, and float voltage.

This Program which complies with the requirements of TS 5.5.17 provides for monitoring various battery parameters based on the recommendations of Reference 2.

1.5 PROGRAM IMPLEMENTATION

The Battery Monitoring and Maintenance Program contains the methodology and parameters used to ensure the station batteries are capable of meeting design and operating requirements.

As required by TS 5.5.17, this Program provides for the restoration and maintenance, based on the recommendations of Reference 2 or of the battery manufacturer of the following:

- 1. Actions to restore battery cells with float voltage < 2.13 V, and
- 2. Actions to equalize and test battery cells that had been discovered with electrolyte level below the minimum established design limit.

This Program is implemented by Technical Requirements Manual Limiting Condition for Operation (TLCO) 3.8.c, "Battery Monitoring and Maintenance." The Bases for TLCO 3.8.c is provided in Attachment A to this Program.

1.6 ACCEPTANCE CRITERIA

The acceptance criteria are contained in station operating or surveillance procedures. TLCO 3.8.c contains the Conditions, Required Actions and associated Completion Times, and Surveillance Requirements required to comply with TS 5.5.17.

1.7 LCOARS/COMPENSATORY MEASURES

TLCO 3.8.c provides the Conditions, Required Actions and associated Completion Times, and Surveillance Requirements required to comply with TS 5.5.17. The requirements of TLCO 3.8.c are proceduralized via the associated LCOAR.

1.8 REPORTING REQUIREMENTS

There are no reporting requirements for the Battery Monitoring and Maintenance Program.

1.9 <u>CHANGE CONTROL</u>

Changes to this Program, other than editorial changes, shall include a 10 CFR 50.59 Review and a Station Qualified Review (SQR). The SQR composition shall include the Regulatory Assurance Department in all cases. As part of the SQR, Byron and Braidwood Plant Operations Review Committee (PORC) approval is required as determined by the Regulatory Assurance Manager. Byron and Braidwood shall implement the same change unless the change has been reviewed and determined not to be applicable to Braidwood.

Attachment A

Bases for TLCO 3.8.c, "Battery Monitoring and Maintenance"

B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.c Battery Monitoring and Maintenance

BASES

BACKGROUND

This TLCO delineates the requirements of the Battery Monitoring and Maintenance Program in accordance with Technical Specification (TS) 5.5.17. A discussion of the batteries and their OPERABILITY requirements is provided in the Bases for LCO 3.8.4, "DC Sources-Operating," LCO 3.8.5, "DC Sources-Shutdown," and LCO 3.8.6, "Battery Parameters."

APPLICABLE SAFETY ANALYSES

The initial conditions of Design Basis Accident (DBA) and transient analyses in the UFSAR, Chapter 6 (Ref. 1) and Chapter 15 (Ref. 2), assume Engineered Safety Feature systems are OPERABLE. The DC electrical power system provides normal and emergency DC electrical power for the diesel generators, emergency auxiliaries, and control and switching during all MODES of operation.

The OPERABILITY of the DC subsystems is consistent with the initial assumptions of the accident analyses and is based upon meeting the design basis of the plant. This includes maintaining at least one division of DC sources OPERABLE during accident conditions, in the event of:

- a. An assumed loss of all offsite AC power or all onsite AC power; and
- b. A worst case single failure.

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Battery cell parameters must remain within acceptable limits to ensure availability of the required DC power to shut down the reactor and maintain it in a safe condition after an anticipated operational occurrence or a postulated DBA. Electrolyte limits are conservatively established, allowing continued DC electrical system function even with Category A and B limits not met. OPERABILITY of the batteries is defined by LCO 3.8.6, "Battery Parameters."

BASES

APPLICABILITY

The battery cell parameters are required solely for the support of the associated DC electrical power subsystems. Therefore, battery electrolyte is only required when the DC power source is required to be OPERABLE. Refer to the Applicability discussion in Bases for LCO 3.8.4 and LCO 3.8.5.

ACTIONS

The ACTIONS Table is modified by a Note which indicates that separate Condition entry is allowed for each battery. This is acceptable, since the Required Actions for each Condition provide appropriate compensatory actions for each affected battery. Complying with the Required Actions for one battery may allow for continued operation, and subsequent battery parameters out of limits are governed by separate Condition entry and application of associated Required Actions.

A.1, A.2, and A.3

With one or more cells in one battery not within limits (i.e., Category A limits not met, Category B limits not met, or Category A and B limits not met) but within the Category C limits specified in Table T3.8.6-1 in the accompanying TLCO, the battery is degraded but there is still sufficient capacity to perform the intended function. Therefore, the affected battery is not required to be considered inoperable solely as a result of Category A or B limits not met and operation is permitted for a limited period.

The pilot cell electrolyte level and float voltage are required to be verified to meet the Category C limits within 1 hour (Required Action A.1). This check will provide a quick indication of the status of the remainder of the battery cells. One hour provides time to inspect the electrolyte level and to confirm the float voltage of the pilot cell. One hour is considered a reasonable amount of time to perform the required verification.

ACTIONS (continued)

Verification that the Category C limits are met (Required Action A.2) provides assurance that during the time needed to restore the parameters to the Category A and B limits, the battery is still capable of performing its intended function. A period of 24 hours is allowed to complete the initial verification because specific gravity measurements must be obtained for each connected cell. Taking into consideration both the time required to perform the required verification and the assurance that the battery cell parameters are not severely degraded, this time is considered reasonable. The verification is repeated at 7 day intervals until the parameters are restored to Category A or B limits. This periodic verification is consistent with the normal Frequency of pilot cell surveillances.

Continued operation is only permitted for 31 days before battery cell parameters must be restored to within Category A and B limits. With the consideration that, while battery capacity is degraded, sufficient capacity exists to perform the intended function and to allow time to fully restore the battery cell parameters to normal limits, this time is acceptable.

ACTIONS (continued)

B.1 and B.2

With one battery with one or more battery cells with electrolyte level less than the minimum established design limit (i.e., 1/2" below the minimum level indication mark), TS 5.5.17 requires that the Battery Monitoring and Maintenance Program provide actions to equalize and test the affected battery cell(s). The Specification 5.5.17 item b to initiate action to equalize and test in accordance with manufacturer's recommendation is taken from Annex D of IEEE Standard 450-1995, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications." 31 days is allowed to equalize and test the affected battery cell(s). However, Condition B is modified by a Note which indicates that Required Actions B.1 and B.2 must be completed after restoring the affected cell electrolyte level to greater than or equal to the minimum established design limits, i.e., after LCO 3.8.6, "Battery Parameters," Required Action C.3 is completed. With the consideration that, while battery capacity is degraded, sufficient capacity exists to perform the intended function and to allow time to fully restore the battery cell parameters to normal limits, this time is acceptable. Based on the results of the manufacturer's recommended testing the battery may have to be declared inoperable and the affected cell(s) replaced.

SURVEILLANCE REQUIREMENTS

TSR 3.8.c.1

This TSR verifies that Category A battery cell parameters are consistent with IEEE-450 (Ref. 3), which recommends regular battery inspections (at least one per month) including voltage, specific gravity, and electrolyte level of pilot cells.

TSR 3.8.c.2

The quarterly inspection of specific gravity and voltage is consistent with IEEE-450 (Ref. 3). In addition, within 7 days of a battery discharge < 110 V or a battery overcharge > 145 V, the battery must be demonstrated to meet Category B limits. Transients, such as motor starting transients, which may momentarily cause battery voltage to drop to < 110 V, do not constitute a battery discharge provided the battery terminal voltage and float current return to pre-transient values. This inspection is also consistent with IEEE-450 (Ref. 3), which recommends special inspections following a severe discharge or overcharge, to ensure that no significant degradation of the battery occurs as a consequence of such discharge or overcharge.

TSR 3.8.c.3

Visual inspection to detect corrosion of the battery cells and connections, or measurement of the resistance of each intercell, interrack, intertier, and terminal connection, provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance.

The limits established for this TSR must not be above the ceiling value established by the manufacturer.

Connection resistance is obtained by subtracting the normal resistance of the interrack (cross room rack) connector or the intertier (bi-level rack) connector from the measured intercell (cell-to-cell) connection resistance.

The Surveillance Frequency for these inspections, which can detect conditions that can cause power losses due to resistance heating, is 92 days. This Frequency is considered acceptable based on operating experience related to detecting corrosion trends.

TSR 3.8.c.4

Visual inspection of the battery cells, cell plates, and battery racks provides an indication of physical damage or abnormal deterioration that could potentially degrade battery performance. The presence of physical damage or deterioration does not necessarily represent a failure of this TSR, provided an evaluation determines that the physical damage or deterioration does not affect the OPERABILITY of the battery (its ability to perform its design function).

TSR 3.8.c.5 and TSR 3.8.c.6

Visual inspection and resistance measurements of intercell, interrack, intertier, and terminal connections provide an indication of physical damage or abnormal deterioration that could indicate degraded battery condition. The anticorrosion material is used to help ensure good electrical connections and to reduce terminal deterioration. The visual inspection for corrosion is not intended to require removal of and inspection under each terminal connection. The removal of visible corrosion is a preventive maintenance TSR. The presence of visible corrosion does not necessarily represent a failure of this TSR provided visible corrosion is removed during performance of TSR 3.8.c.5.

The connection resistance limits for TSR 3.8.c.6 shall not be above the ceiling value established by the manufacturer.

Connection resistance is obtained by subtracting the normal resistance of the interrack (cross room rack) connector or the intertier (bi-level rack) connector from the measured intercell (cell-to-cell) connection resistance.

Table T3.8.6-1

This table delineates the limits on electrolyte level, float voltage, and specific gravity for three different categories. The meaning of each category is discussed below.

Category A defines the normal parameter limit for each designated pilot cell in each battery. The cells selected as pilot cells are those whose temperature, voltage, and electrolyte specific gravity approximate the state of charge of the entire battery.

The Category A limits specified for electrolyte level are based on manufacturer recommendations and are consistent with the guidance in IEEE-450 (Ref. 3), with the extra ¼ inch allowance above the high water level indication for operating margin to account for temperatures and charge effects. In addition to this allowance, footnote (a) to Table T3.8.6-1 permits the electrolyte level to be above the specified maximum level during equalizing charge, provided it is not overflowing. These limits ensure that the plates suffer no physical damage, and that adequate electron transfer capability is maintained in the event of transient conditions. IEEE-450 (Ref. 3) recommends that electrolyte level readings should be made only after the battery has been at float charge for at least 72 hours.

The Category A limit specified for float voltage is ≥ 2.13 V per cell. This value is based on the recommendations of IEEE-450 (Ref. 3), which states that prolonged operation of cells < 2.13 V can reduce the life expectancy of cells.

The Category A limit specified for specific gravity for each pilot cell is ≥ 1.200 (0.015 below the manufacturer fully charged nominal specific gravity or a battery charging current that had stabilized at a low value). This value is characteristic of a charged cell with adequate capacity. According to IEEE-450 (Ref. 3), the specific gravity readings are based on a temperature of $77^{\circ}F$ ($25^{\circ}C$).

The specific gravity readings are corrected for actual electrolyte temperature. For each $3^{\circ}F$ (1.67°C) above $77^{\circ}F$ (25°C), 1 point (0.001) is added to the reading; 1 point is subtracted for each $3^{\circ}F$ below $77^{\circ}F$.

Category B defines the normal parameter limits for each connected cell. The term "connected cell" excludes any battery cell that may be jumpered out.

The Category B limits specified for electrolyte level and float voltage are the same as those specified for Category A and have been discussed above. Footnote (b) to Table T3.8.6-1 requires the float voltage correction for average electrolyte temperature. The Category B limit specified for specific gravity for each connected cell is ≥ 1.195 (0.020 below the manufacturer fully charged, nominal specific gravity) with the average of all connected cells > 1.205 (0.010 below the manufacturer fully charged, nominal specific gravity). These values are based on manufacturer's recommendations. The minimum specific gravity value required for each cell ensures that the effects of a highly charged or newly installed cell will not mask overall degradation of the battery.

Category C defines the limits for each connected cell. These values, although reduced, provide assurance that sufficient capacity exists to perform the intended function and maintain a margin of safety.

The Category C limits specified for electrolyte level (above the top of the plates and not overflowing) ensure that the plates suffer no physical damage and maintain adequate electron transfer capability. The Category C limits for float voltage is based on IEEE-450 (Ref. 3), which states that a cell voltage of 2.07 V or below, under float conditions and not caused by elevated temperature of the cell, indicates internal cell problems and may require cell replacement.

The Category C limit of average specific gravity ≥ 1.195 is based on manufacturer recommendations (0.020 below the manufacturer recommended fully charged, nominal specific gravity). In addition to that limit, it is required that the specific gravity for each connected cell must be no less than 0.020 below the average of all connected cells. This limit ensures that the effect of a highly charged or new cell does not mask overall degradation of the battery.

BASES

SURVEILLANCE REQUIREMENTS (continued)

Because of specific gravity gradients that are produced during the recharging process, delays of several days may occur while waiting for the specific gravity to stabilize. A stabilized charger current is an acceptable alternative to specific gravity measurement for determining the state of charge. This phenomenon is discussed in IEEE-450 (Ref. 3). Footnote (d) to Table T3.8.6-1 allows the float charge current to be used as an alternate to specific gravity for up to 7 days following a battery recharge. Within 7 days, each connected cell's specific gravity must be measured to confirm the state of charge. Following a minor battery recharge (such as equalizing charge that does not follow a deep discharge) specific gravity gradients are not significant, and confirming measurements may be made in less than 7 days.

REFERENCES

- 1. UFSAR, Chapter 6.
- 2. UFSAR, Chapter 15.
- 3. IEEE-450-1995.

CONTROL ROOM ENVELOPE HABITABILITY PROGRAM BRAIDWOOD

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1.7	LCOARS/COMPENSATORY MEASURES
1.8	REPORTING REQUIREMENTS
1.9	CHANGE CONTROL

1.1 PURPOSE

This Program ensures that Control Room Envelope Habitability (CREH) is maintained such that, with an OPERABLE Control Room Ventilation (VC) Filtration System, the Control Room Envelope (CRE) occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge by assessing and performing testing in accordance with Technical Specification (TS) 3.7.10, "Control Room Ventilation (VC) Filtration System" and the Control Room Habitability Program. The CREH Program is defined by TS 5.5.18.

1.2 REFERENCES

- 1. Technical Specifications:
 - a. 3.7.10, "Control Room Ventilation (VC) Filtration System"
 - b. 5.5.18, "Control Room Envelope Habitability Program"
- 2. Update Final Safety Analysis Report Sections:
 - a. 6.4, "Habitability Systems"
 - b. 9.4.1, "Control Room HVAC System"
- 3. Regulatory Guide 1.196, "Control Room Habitability at Light-Water Nuclear Power Reactors," Revision 0
- 4. NEI 99-03, "Control Room Habitability Assessment Guidance," Revision 0
- 5. Design Basis Accident (DBA) Control Room Dose Calculations:
 - a. BRW-04-0038-M. "Loss Of Coolant Accident"
 - b. BRW-04-0039-M, "Control Rod Ejection Accident"
 - c. BRW-04-0040-M, "Main Steam Line Break Accident"
 - d. BRW-04-0041-M, "Fuel Handling Building Accident"
 - e. BRW-04-0042-M, "Steam Generator Tube Rupture Accident"
 - f. BRW-04-0043-M, "Locked Rotor Accident"

1.3 DEFINITIONS AND/OR ACRONYMS

- 1. BREACH: Any work activity or testing that creates or enlarges an opening through a barrier, which would allow the propagation of a hazard through the barrier. Following are some examples:
 - Modification (addition, removal or degradation) of a penetration seal or structural component

- Core boring

- Blocking open a door/hatch or damper

- Modification (addition, removal, or degradation) of a door/hatch or damper
- 2. CONTROL ROOM ENVELOPE (CRE): The area within the confines of the control room envelope boundary that contains the spaces Occupants inhabit to control the plant for normal and accident conditions. This area encompasses the control room and other non-critical areas to which frequent personnel access or continuous occupancy is not necessary in the event of an accident. The CRE is protected during normal operation, natural events, and accident conditions. The Braidwood CRE is shown in drawing M-1033-13.
- 3. CRE BOUNDARY: A combination of walls, floor, roof, ducting, doors, penetrations and equipment that physically form the CRE.
- 4. CRE INTEGRITY: The condition whereby the control room habitability systems (CRHSs) are functioning to ensure the protection of the Operators in the CRE during normal and accident conditions.
- 5. CONTROL ROOM HABITABILITY SYSTEMS (CRHS): The plant systems that help ensure CRE habitability. This includes the Control Room (CR) emergency ventilation/filtration system and the Control Room (CR) heating, ventilating and airconditioning (HVAC) systems. The CRE boundary is considered as an integral part of the CRHS, since it is critical to maintaining CRE habitability.

- 6. FILTERED INLEAKAGE: This inleakage occurs at a location in the CRHS that allows the inleakage air contamination to be filtered prior to entering the habitability zone. An example is duct inleakage on the suction side of a recirculation air carbon filter where the duct is outside the CRE. Radionuclides are removed from this air prior to it entering the CRE. There is no filtering assumed for hazardous chemical events.
- 7. INTEGRATED TRACER GAS TEST: A tracer gas test to determine total inleakage into the CRE. The tracer gas test is actually measuring the total amount of outside air entering the CRE, and the inleakage air is determined by subtracting the filtered outside air supply value from this figure. This particular test may not locate leaks; it does, however, provide a value for total inleakage.
- 8. TRACER GAS (from ASTM E741): A gas that can be mixed with air in very small concentrations in order to study air movement.
- 9. UNFILTERED INLEAKAGE: This is inleakage that occurs at a location in the CRHS that allows inleakage air to enter the control room envelope without any contaminants being filtered prior to entry. Examples would be penetrations and dampers that are at a negative pressure with respect to potentially contaminated surroundings and located such that radionuclides are not removed prior to the inleakage air entering the CRE.

1.4 PROGRAM DESCRIPTION

This Program ensures that CRE Habitability is maintained in accordance with NRC regulations and plant-specific commitments. Specifically, the CRE Habitability Program ensures compliance with 10 CFR 50, Appendix A, General Design Criterion 19 - Control Room (GDC 19). CRE Habitability must be maintained during normal operations as well as during radiological, hazardous chemical, or smoke event emergencies. Administration of this Program, through periodic inleakage testing, periodic assessments, configuration control, and preventive maintenance, will ensure that CRE Habitability and Integrity are maintained. This CRE Habitability Program is the result of an NRC commitment to Generic Letter 2003-01 for all Exelon Nuclear / AmerGen plant Technical Specifications to have an administrative program for CRE Habitability.

1.5 PROGRAM IMPLEMENTATION

A CRE Habitability Program shall be established and implemented to ensure that CRE Habitability is maintained such that, with an OPERABLE Control Room Emergency Ventilation/Filtration System, CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under design basis accident (DBA) conditions without personnel receiving radiation exposures in excess of 5 rem total effective dose equivalent (TEDE) for the duration of the accident. The program shall include the following elements:

- a. The definition of the CRE and CRE boundary.
- b. Requirements for maintaining the CRE boundary in its design condition including configuration control and preventive maintenance.
- c. Requirements for determining the unfiltered air inleakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.
- d. Measurement of the CRE pressure relative to all external areas adjacent to the CRE boundary during the pressurization mode of operation by one train of the Control Room Emergency Ventilation/Filtration System, operating at the flow rate required by the Ventilation Filter Testing Program, at a Frequency of 18 months on a STAGGERED TEST BASIS. The results shall be trended and used as part of the 18 months assessment of the CRE boundary.

- e. The quantitative limits on unfiltered air inleakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air inleakage measured by the testing described in paragraph c. The unfiltered air inleakage limit for radiological challenges is the inleakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air inleakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis.
- f. The provisions of SR 3.0.2 are applicable to the Frequencies for assessing CRE habitability, determining CRE unfiltered inleakage, and measuring CRE pressure and assessing the CRE boundary as required by paragraphs c and d, respectively.

1.6 ACCEPTANCE CRITERIA

- 1. The quantitative limits on unfiltered air inleakage do not exceed the values assumed in the dose analysis for DBAs.
- 2. Periodic Assessments do not identify any degraded conditions or programs that could result in exceeding the licensing basis analysis of DBA consequences to the CRE occupants.

1.7 LCOARS/COMPENSATORY MEASURES

In the event any of the acceptance criteria is not met, the Shift Manager will immediately be notified. The Shift Manager shall determine OPERABILITY status and implement a LCOAR as applicable. In addition, an Issue Report may be generated to provide proper tracking and resolution of the noted problems associated with the implementation of this program.

1.8 REPORTING REQUIREMENTS

Any reporting requirements associated with acceptance criteria of this Program not being met shall be reported in accordance with the requirements specified in the implementing procedures or determined through the Corrective Action Process.

1.9 CHANGE CONTROL

Changes to this Program, other than editorial changes, shall include a 10 CFR 50.59 Review and a Station Qualified Review (SQR). The SQR composition shall include Regulatory Assurance Department in all cases. As a part of the SQR, Byron and Braidwood Plant Operations Review Committee (PORC) approval is required as determined by the Regulatory Assurance Manager. Byron and Braidwood shall implement the same change unless the change being implemented at Braidwood has been reviewed and was determined not to be applicable to Byron.

SURVEILLANCE FREQUENCY CONTROL PROGRAM BRAIDWOOD

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1.9	CHANGE CONTROL

1.1 PURPOSE

The purpose of this Program is to provide the administrative controls for modifying surveillance frequencies in accordance with Technical Specification (TS) 5.5.19, "Surveillance Frequency Control Program." The Surveillance Frequency Control Program (SFCP) ensures that Surveillance Requirements specified in the TSs are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.

1.2 <u>REFERENCES</u>

- 1. Technical Specification 5.5.19, "Surveillance Frequency Control Program"
- 2. NEI 04-10, "Risk-Informed Method for Control of Surveillances Frequencies," Revision 1
- 3. Letter from N.J. DiFrancesco (U. S. NRC) to M.J. Pacilio (Exelon Generation Company, LLC), "Braidwood Station, Units 1 and 2 Issuance of Amendments Regarding Technical Specification Change for the Relocation of Specific Surveillance Frequency Requirements Based on Technical Specification Task Force-425," dated February 24, 2011.

1.3 DEFINITIONS AND/OR ACRONYMS

Definitions and/or acronyms are consistent with definitions provided in Technical Specification Section 1.0, "Use and Application."

1.4 PROGRAM DESCRIPTIONS

The list of periodic surveillances and associated TS Bases information that were relocated to the SFCP as part of License Amendment No. 165 for Braidwood Station, Units 1 and Unit 2 are provided in a separate tab in the TS LCO book for ease of locating.

Table 1 under this tab includes a reference to the TS SR number, a surveillance description, the frequency, and current revision. The description is a summary description of the referenced TS SR which is provided for information purposes only and is not intended to be a substitute for the actual TS requirements. Refer to the TS for the specific action required by each respective TS SR identified in the list.

Table 2 under this tab provides the associated Bases description for each TS SR Frequency.

Changes to the type or scope of testing (e.g., Channel Check, Channel Functional Test, or Channel Calibration) are not allowed without prior NRC approval. The specified frequencies ensure TS SRs are performed at intervals sufficient to assure associated Limiting Conditions for Operation (LCOs) are met.

Changes to the information in Tables 1 and 2 may occur for one of two reasons:

- 1. Addition, deletion, or modification of the associated TS SR through a license amendment request, or
- 2. A change to a surveillance frequency in accordance with the SFCP and associated implementing procedures. Changes to individual surveillance frequencies are evaluated using the methodology provided in NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.

As noted in Tables 1 and 2, Surveillance Frequencies beyond Revision 0 have been evaluated in accordance with TS Section 5.5.19, "Surveillance Frequency Control Program." Surveillance frequencies at Revision 0 reflect the approved licensing basis upon initial SFCP implementation.

The provisions of TS SR 3.0.2 and 3.0.3 are applicable to the frequencies established in the SFCP.

1.5 PROGRAM IMPLEMENTATION

Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for control of Surveillance Frequencies," Revision 1.

1.6 <u>ACCEPTANCE CRITERIA</u>

Not applicable.

1.7 LCOARS/COMPENSATORY MEASURES

Noncompliance with the frequencies specified in the SFCP (e.g., a missed surveillance) requires generation of an Issue Report in accordance with LS-AA-125.

1.8 REPORTING REQUIREMENTS

Based on the guidance provided in NUREG-1022, "Event Reporting Guidelines, 10 CFR 50.72 and 50.73," Revision 2, missed surveillances are not reportable as a condition prohibited by TS unless the surveillance, once performed, indicates that the equipment was not capable of performing its specified safety function(s) for a period of time longer than allowed by TS.

1.9 CHANGE CONTROL

The change control process associated with revisions to Surveillance Frequencies is defined in NEI 04-10, "Risk-Informed Method for Control of Surveillances Frequencies," Revision 1.